

Appendix 2

CHI/17/113

23<sup>rd</sup> August 2017

HMO Overprovision Policy – Report on Public Consultation

Responses Received to Public Consultation

## HMO Overprovision Consultation - Comments Received

### YES Responses - Individuals

(highlighted text suggests response intended as NO)

Will be great if this can help people struggling to find affordable, good quality housing in Aberdeen.

My comment is that I don't need a map to know which houses in the area are HMOs. Just walk along the street and see the unkempt gardens littered with rubbish. And/or the overflowing bins where the occupants have no idea what "recycling" means and just use the nearest bin for everything. At least with purpose built accommodation, this sort of thing is controlled. Try getting to sleep at night as the clubbers head into town about midnight and then come noisily home at 04.00 a.m. I know that young people need to have some freedom. However, every year is a different intake who at doing the freedom bit for the first time. Other people live in the area, not just students.

I would prefer it to be made even stronger.

I feel strongly that Aberdeen City Council should place a limit on HMO numbers in Old Aberdeen, where I live (and the other areas you feature). If this is not done, we will be left with ghost neighbourhoods with no family continuity, no life. Aberdeen is very much behind the curve on this matter. St Andrews established limits some time ago. There is also the matter of scruffiness. HMO houses are notorious for their unkempt gardens, usually a sea of dandelions. In my opinion, HMO landlords should be obliged to contract to maintain gardens rather than pull the neighbourhood down.

I feel that Aberdeen has an overprovision of HMOs in the areas detailed in your maps and that this overprovision is affecting the amenity of these areas. HMOs usually stand out in a residential area because of their neglected appearance. Curtains and blinds are kept closed and nettles and dandelions thrive in the gardens. Car parking is often a problem. House prices can be affected.

There needs to be less HMOs in residential areas. These incur a large influx of traffic into an area and there are no provisions made for these.

It seems fair, straight forward and hopefully will address the imbalance .

This policy should be implemented as soon as possible.

It does not cover 2 bedroom buy to let properties which can have the same effect on the neighbourhood and the quality of life of long term residents.

HMO properties are very useful to many groups of ordinary working people in Aberdeen.

The folk that use these types of properties would be financially affected because of property prices in the city.

A large percentage of HMO tenants are from the regular work force from hospital staff, tradesmen, students to name only a small percentage.

## HMO Overprovision Consultation - Comments Received

### YES Responses - Individuals

(highlighted text suggests response intended as NO)

Yes, it should be implemented. There are far too many properties with HMOs which blight Aberdeen.

10% seems drastic. I can understand wanting to reduce student concentration a little but to ensure they are only 10% of all seems too severe. Especially as:

The only areas targetted are the ones closest to University of Aberdeen

HMO licence in Aberdeen is only 3+, where in other towns it is greater and more widespread

HMOs are already hard to find for a student and to make it more so makes little sense

The idea is long overdue. I'd like the large areas split into smaller areas and a lower %. But as this is not on offer I fully support this. Yes students are vital but there is now much more student accommodation and students like most workers cannot expect to live within easy walking distance of their work. They can use buses!!

Too many hmos destroy local areas. Gardens tend to be neglected. Local amenities are used only 30 weeks a year and will therefore close down,

There is already an over provision of HMO's in the Old Aberdeen area which has had a huge effect on the demographics.

There have already been complaints of Students in HMO's upsetting the local residents with young families with late night parties and anti social behaviour towards any who ask them to keep the noise down and respect others who live close by.

It would be lovely if we could all lived next door to where we work in order to save money on travel, As advocate by the student's Lewis Macleod Communities Officer. This attitude shows little respect for the residents of the proposed areas marked out for additional HMO's. Many students have to travel all over Aberdeen to different venues for their lectures and classes, so the requirement to live next to the University would not hold up.

By having a concentration of HMO's may have the effect of creating ghettos of young people who do not have the same goal in life as the local residents.

It therefore makes sense to limit and control HMO's within the suggested areas.

It would also make sense to have a central contact point where the public are able to report problem HMO's. This information should be logged and record after conformation of the issues in question. This information can quickly and efficiently used when the licence renewal is lodged for problem properties.

Old Aberdeen has very few houses for families. It is essential for social cohesion that the right balance is kept between family homes and student accommodation.

There are too many HMOs in Old Aberdeen

I agree that the limit should be 10%

I feel that at the moment there is a high volume of HMO properties. They appear to out number homes for long term residents. Living in the Orchard of 22 properties 19 are HMO

## HMO Overprovision Consultation - Comments Received

### YES Responses - Individuals

(highlighted text suggests response intended as NO)

1/ The maps, as provided, are fundamentally inadequate as they do not show the full extent of the area.

2/ The policy uses Community Planning Neighbourhoods as the area designation. Community Council areas would be much clearer to the public as these are more widely known and understood.

3/ The proposed boundary fails in that it omits an important locality that feels itself part of Old Aberdeen. This is a part of Tillydrone Avenue - COA S00089607.

4/ The Policy should specifically name all the COAs that lie within the controlled area. A list by boundary is insufficient as in many cases the boundary has split a COA in two.

5/ The Policy is based on the number of HMOs within each COA, so these must be identified and entire but, as drawn, some COAs are cut in half - this is unworkable.

There is a need to restrict licences.

This policy is unfair to students. Who have little or no means of income.

There must be recognition of the fact that HMOs change the character of a street or neighbourhood in any community. HMOs are nothing new and the issue is not about students who are often forced to use such accommodation by a lack of affordable alternatives

I live over Tillydrone Avenue. I can see that while the house is within the Old Aberdeen conservation area, it is not included within the census area.

The group of houses at Tillydrone Avenue has been a nice community for a long time. We would really like to maintain this community and family friendly environment. I believe that any additional change to an HMO of any of these Tillydrone Avenue houses (Numbers 54 to 88) will heavily affect the family and community environment of these Tillydrone houses. It takes a long time (years) to build up a community but a few wrong actions and decisions to destroy it. The existing HMO already had a detrimental effect on the parking spaces available. Moreover, the student accommodation within the Tillydrone Avenue houses was empty for a number of months last year and it looks untidy/abandoned.

I believe we should be within the HMO overprovision policy area.

Please include the Tillydrone Houses (54 to 88) within the HMO overprovision policy area.

## HMO Overprovision Consultation - Comments Received

### YES Responses - Individuals

(highlighted text suggests response intended as NO)

I live over Tillydrone Avenue. I can see that while our house is within the Old Aberdeen conservation area, it is not included within the census area. The group of houses at Tillydrone Avenue has been a nice community for a long time. We would really like to maintain this community and family friendly environment. I believe that any additional change to an HMO of any of these Tillydrone Avenue houses (Numbers 54 to 88) will heavily affect the family and community environment of these Tillydrone houses. It takes a long time (years) to build up a community but a few wrong actions and decisions to destroy it. The existing HMO already had a detrimental effect on the parking spaces available. Moreover, the student accomodation within the Tillydrone Avenue houses was empty for a number of months last year and it looks untidy/abandoned. I believe we should be within the HMO overprovision policy area. Please include the Tillydrone Houses (54 to 88) within the HMO overprovision policy area.

Whilst not perfect, this draft provides a framework through which the needs of both the long-term resident, and the occupiers of HMOs, can be addressed to the mutual benefit of both groups. HMOs are necessary to fulfil the needs of short-term residents, student or young person starting out in a career, but the continued proliferation of HMOs for the short term financial gain of a few developers, cannot be allowed to further blight the affected areas of Aberdeen to the detriment of the environment, housing stock and those who choose to spend a lifetime in Aberdeen.

The absent landlords do not come and check on their properties. So letting Old Aberdeen down badly.

As a resident of Aberdeen City, I disagree with the proposed policy. Limiting the provision of HMOs will negatively affect the quality and provision of housing in the city, especially for students and young professionals who frequently choose HMO properties. The areas included in the proposed policy deliberately target students from universities in Aberdeen as they are located close to the main campuses. As a former student of the University of Aberdeen, I have experienced the difficulties associated with finding suitable HMO properties available for a liveable rent. This policy will further increase the rental premium associated with HMO properties at the expense of primarily students in Aberdeen and for the benefit of private landlords. We should be supporting students - who represent much of the lifeblood of the economy in the city - rather than exploiting them in this way. I appreciate that other local residents in these areas may feel there are negative effects of more HMO properties in the area, however I feel it is wrong to associate these with all those using HMO properties and this policy will do nothing to reduce anti-social behaviour.

I live at AB  
8,10,12,14 and 16 are HMOs  
Similarly King Street at back of me has several properties and again on Orchard Street.  
I am sandwiched in between these HMOs!

## HMO Overprovision Consultation - Comments Received

### YES Responses - Individuals

(highlighted text suggests response intended as NO)

HMO s have the outward appearance of being abandoned - gardens full of weeds, front paths never swept, bins overflowing. King Street is a disgrace and any visitor walking there in the vicinity of the University must be appalled. Private landlords and students have no civic pride. Enough is enough. There seems to be a a choice of purpose built student accommodation, so family houses should be for families for community balance.

I have stayed here since 1973 and like my son said in his letter. This is not the lovely area that I remember in 1973 far too much H-M-Os. To much turn over of people. No neighbourly feeling, very noisy for parts of the year & then like a ghost town at other times. To many people not caring at all about the Auld Toon. To much rubbish bins everywhere people urinating in the street vomit & rubbish in our path's. Enough is enough. No more H-M-O's

I am an owner occupier & have still at my present address since 1973. It was a great & lovely area for a long time then ... the swamping of H-M-O's. A lot of old neighbours & friends have moved on or passed away. These properties were snapped up by some not all unscrupulous landlords who then filled these HMOs with people & more than a few students & most of the people would changing on a very regular basis. Most who had no intrest in the aera & did not really care as they would move on & be replaced by others & so the cycle continued. Our once lovely aera the Auld Toon is being destroyed - bins not put out or left indefinatley, noisy house & garden partys filthy streets broken glass everywhere propertys run down ... TO - MUCH - H-M-O's

My impression is that there is more than enough provision for students throughout the city. Students only contribute to the very local community for a limited time each year - sometimes not constructively. Old Aberdeen has a sense of community which should be preserved.

I agree wholeheartedly with the proposal to limit the number of HMO properties in the Old Aberdeen area. I have lived in this area for over 40 years and it saddens me greatly to have witnessed the deterioration of the 'family atmosphere' within the area. I feel strongly that a limit on the number of HMO properties would help greatly to regain the balance within the area before it is too late.

I think this is a \*very important initiative as it's important not to change the nature of these areas - particularly the historical Old Aberdeen area.

Please be clear I am no anti student or I would not live here. I enjoy the interesting mix and youthful vibe in this area. However I do not want the area to be overwhelmed to the point where our own families are prised out of our area.

Community is when you know your neighbours, look out and are for each other, watch your families grow up and get older.

To feel safe and secure. This does not happen with transitional groups housed by landlords who care about nothing but profit for the main.

HMOs affect all communities and there is a need to place a limit on certain areas where over development has occurred

**HMO Overprovision Consultation - Comments Received**  
**Yes Responses - HMO Landlords**  
(highlighted text suggests response intended as NO)

I feel like HMO properties are good as Aberdeen is very expensive for both students and non students.

It is important to identify that it is not only students who live in HMO but a lot of professionals do as well.

A newly qualified teacher could not afford to live alone therefore it is much better to live in HMO. Seeing as there is already a teacher shortage in Aberdeen removing HMO's would make it even more difficult to bring in teachers as well as keep current teachers.

**HMO Overprovision Consultation - Comments Received**  
**Yes Responses - Landlords**

Excessive adaption of homes to HMO properties reduces number of homes suitable for families and thus overprovision control is a sensible approach to maintain a balance.

The draft policy seems to be in favor of large developers who recently developed lots of student accommodation in Aberdeen.

Council has to consider that not all the professional or even students prefer to live in the large halls and that means still private accommodation should be allowed to be available.



**HMO Overprovision Consultation - Comments Received**  
**YES Responses - Students**

(highlighted comments - text would suggest respondent meant to vote NO)

I think if the council will restrict the HMO in those areas, there will be an exodus of students to neighbouring communities that are considerably far from the university just to find a cheaper accommodation. It means that, students, especially those who have limited funds. They have to travel for a long time and spend more money in transportation instead of just walking from their home to the campus. If they want to limit the HMO licenses in a community, they must have an affordable accommodation facilities for students, in which we know, they don't have because student accommodation here is too expensive.

With two universities, it is time Aberdeen starts thinking as a student city. This will benefit neither students, neither the city itself. By having HMO's, Aberdeen allows students to be in the heart of the community, to be a part of it. By limiting the number of HMO's, not only is student accommodation choice reduced, but the price range as well. HMO's are often cheaper and their location can enable them to travel to both uni and their workplace. Having non-student neighbours is also enriching. This draft policy is a step backwards when Aberdeen should be going forwards. It doesn't do enough for it's students and this is a clear proof of it.

Yes--a limit to HMO would adversely affect the local communities.

It would discriminate against and push students into more expensive halls that Unite & Hello Student charge up to £12k per annum (compare that to my current rent is just over £2500, which is affordable for me as a mature student with family). Alternatively, it would mean more commuting across the city with associated increases in costs to the students themselves as well as increasing traffic, congestion and aggravating air pollution problems.

This policy is targeting the areas of Old Aberdeen, Froghall/Powis/Sunnybank, and Garthdee – the three areas directly surrounding the two Universities in the city. Students give so much to the local community, please ensure that we are not shut out.

I think it's a good idea and should be implemented. We currently pay expensive rates for "rat holes". It will be great to have other options.

The proposed HMO policy is discriminating against students. Aberdeen is a thriving, vibrant city, largely due to the student scene. Young students are intelligent young people who are studying to make a difference for, not just their own future, but the futures of generations to come. Advances in medicine, engineering and the sciences are just a few of the specialities of Aberdeen students. To punish them by taking away their houses is disgraceful. Maybe those who chose to live so close to a University (which was founded over 500 years ago) should reconsider their choice of home if there is a great issue. Furthermore, taking limiting the number of HMO homes would mean that students would need to seek purpose build student accommodation which is over-priced. Exploitation of young people happens far too often by those who are obstinate on their opinion of student culture, and I for one, would not be proud to live in a city which backs the opinion of a small minded group of people who do not view the wider picture.

**HMO Overprovision Consultation - Comments Received**  
**YES Responses - HMO Neighbours**

Parking in sunnybank area is already very difficult as students not living in the area use the streets to park for free and walk to university. Also multiple occupancy buildings, particularly student ones can be very disruptive at the weekends. I understand that being within close quarters to the university that a degree of such housing is required. But planners must bare in mind this is also a long established residential area with families. A cap would be highly appropriate.

This consideration should cover the entire Aberdeen city area. Not just the area's highlighted. Roslin Terrace has a high level of HMO properties. Possibly as high as 50% of the accomodation in the street is accounted for by HMO. This is not condusive to normal neighbourly living. 10 years ago our street held regular street parties and barbecues where all the neighbours met and interacted. Gave support to the elderly neighbours and generally interacted with each other. We don't have a neighbourhood now due to the high turnover of people living in the street.

Impact should be considered for the neighbours of such premises. Thus licenses for these premises should be evenly distributed throughout different wards of Aberdeen city, not only in the city centre and particularly not Roslin Terrace!

The occupations of the tenants should also be considered. Students have a vastly different lifestyle to working people and families.

The impact on the liveliehood of those neighbours needs to be strictly governed where students are concerned. High levels of concentrated HMO properties with student occupants have a major impact on local residents. I would suggest that HMO licenses where the occupants are students should be restricted to a low percentage and re-evaluated at least every year to allow any problems to be addressed and considered appropriately and swiftly. At present the standard three year licence doesn't allow for a re-evaluation and in turn leads to a potentially long period for neighbours to endure. I have first hand experience of a landlord unwilling to adress problems with tenants until close to re-licensing time.

HMO's were once an oppportunity for working people to gain affordable housing in the city to allow them work. With so many new build student accomodation available I would suggest that students sharing an HMO property is a lifestyle choice. The council or HMO unit should manage the licenses on these properties appropriately and maybe place an additional fee on the license for doing this.

If there too many HMOs in a neighbourhood it is bad for the neighbourhood. There are issues with rubbish disposal, noise, and untended gardens all of which are detrimental to the amenity of the area. There is no real upside to having HMOs in an area.

I agree that it is right to prevent excessive concentrations of HMOs in Aberdeen. Too many HMOs in a given part of the city can, for a variety of reasons, have a negative impact on the environment and quality of life in that area.

It is essential that a limit is put on how many houses in Garthdee become HMOs. If not every time a house comes up for sale landlords will purchase and the area becomes a community of students and workers here for a short term. We are losing a sense of community and stability as relationships aren't formed as HMO tenants know they are moving on and don't feel any attachment to the area. There is also an issue with tenants who do not care for their gardens or put rubbish and recycling out. Once again Garthdee suffers to having RGU on its doorstep. ACC needs to consider the permanent residents in Garthdee and put their needs for a cohesive community before landlords whose aim is to run a business with no thought to the impact this has on Garthdee.

**HMO Overprovision Consultation - Comments Received**  
**YES Responses - HMO Neighbours**

One of the maps is out of date. On the first one what used to be a factory on Froghall Terrace is now flats.

I agree with the draft policy that it is important to limit the number of HMO properties in specific areas. I speak as a resident of Old Aberdeen who is concerned about the impact of HMO properties on the long term future of the area and the community.

While the predominantly transitory residents who occupy HMO properties are welcome in the community, it is vital that they don't become the community. Homes that were built predominantly for families are now increasingly owned by property owners who don't live in the area (some not in Aberdeen, some - including businesses - not even in Scotland). I would argue that properties that are regarded as a means of making money are not going to be treasured in the way they would be if they were long term family homes. Similarly, residents who only occupy a property for a year or two will have no long-term interest in the long-term community value of that house or flat. Indeed, certain areas within the proposed areas for limiting HMOs are losing their sense of community. I speak from experience as a former resident of the area called The Orchard. It is my understanding that when this area was built, Aberdeen City Council rejected proposals to build designated student accommodation, opting instead for family homes. I believe the area has now become 60% HMO properties, effectively turning the area into a designated student accommodation area by the back door. We moved from the area when our twin girls were two years old, deciding that The Orchard was not an appropriate place to raise young children. A couple directly across from us also moved for the same reason when they had a baby. Yet another couple, with a girl the same age as our girls, moved away from Orchard Place for the same reason. These properties are then bought by landlords and turned into HMO properties. We currently live in Orchard Walk, near to where we used to live, though in our Walk there is a very strong sense of community. We like to live in the area, but we value long-term friendships and neighbours who we know will support us. If an overprovision policy is rejected, there will then be nothing to stop more and more homes being bought with the purpose of making profit, which will result in more families moving away. This is an historic area and the damage to it could be irreparable. There is a local community council and a Heritage Society run by local residents to help preserve what is best in the area - would landlords or transitory residents make such an effort?

I would also like to make comment on certain assumptions that this proposed overprovision policy is somehow an attack on students, as well as the argument that students have a right to live next to their place of study. Most of my neighbours are either former students or are associated with the university. We have nothing against students, we are simply trying to preserve a long-term community. It has been argued that students are important to the community, and I would whole heartedly agree with this - providing there is a balance. There is an increasing assumption that the area around the university is "a student area" when in fact it is a residential area. There is also an increasing assumption that the area I live in with my family is part of the university campus. Again, this is incorrect. I would add that while students are as entitled as anyone to live close to the university, they do not have a right to do so simply because this is convenient for them. I appreciate that it can make life easier for them, but part of a university education is about becoming independent and realising that there are obstacles to overcome in life. Even with an overprovision policy in place, there should still be plenty of HMO properties throughout the city available for students. Having to travel to and from classes is not such a terrible hardship. Similarly, I don't believe landlords should have a right to buy up the bulk of properties in a residential area with the purpose of making money from them. Family homes are being altered in such a way that it will be very difficult for them to ever be suitable for families again.

I am aware that Aberdeen City Council is keen to promote a sense of community throughout the city. In my own area, Old Aberdeen, there is a still strong but diminishing community of long-term residents. An overprovision policy on HMOs would go a long way to helping to preserve the community into the future.

**HMO Overprovision Consultation - Comments Received**  
**YES Responses - HMO Neighbours**

In my area there are far too many HMO, many more than marked on map. Often the gardens are not neatly kept. When they move out of the house their rubbish is dumped in the garden and landlords do not want to do anything to tidy it up. Their rubbish bin is often overflowing.  
More than 3 people in a house means more than 3 extra cars in the street which makes parking more difficult.  
Sometimes there are noisy parties, in the house and outside in the gardens.

As there are 2 HMO properties close by I strongly feel that houses 54-88 Tillydrone Avenue should be included in the policy.

Houses 54-88 Tillydrone Avenue should be included within the Old Aberdeen area for consideration under this policy.

With reference to the Old Aberdeen area in particular, consideration should be given to the diminishing number of family homes in this area as a result of the growing number of HMO properties that are in the main occupied during the academic terms/on a seasonal basis. These properties are often neglected when unoccupied and leave the area run down and devoid of a community for almost half the year. The concentration of HMO in areas also produces a concentration of noise pollution, an excess of refuse and bins permanently on these streets and an excessive burden is put on the local Doctors surgeries where permanent and often vulnerable residents have to wait weeks for appointments.

I wholeheartedly support this policy for the following reasons.  
Having too many HMOs is going to detract from permanent families living here.  
Also some parts of Aberdeen are becoming deserted in the vacations

I have lived in Old Aberdeen for c25 years and over that period the number of houses let to students has increased considerably. I have been next door to a particularly difficult HMO and everyday life can be impacted considerably by a set of noisy tenants. The majority of let properties are fine but in my opinion, keeping the numbers within a certain percentage will lead to a more mixed community which is not dominated by one type of occupant

This is a good idea Thank you

This is needed Thank you

I stay in Orchard Rd where there are quite a number of HMOs. The road has become quite untidy looking over the past few years. Refuse bins are left on the pavement all the time, gardens are not looked after resulting in overgrown plants and weeds which spread seeds into neighbouring tidy gardens - more work for these owners trying to keep their gardens weed free.  
I am, therefore, very much in favour of no more HMOs being allowed in the area as they have a detrimental effect on the neighbourhood.

## HMO Overprovision Consultation - Comments Received

### YES Responses - HMO Neighbours

As a resident of Old Aberdeen and an employee of the University, I am of two minds on this. Obviously, students need a place to live and this gives a demand for HMO properties. On the other hand, large concentrations of very short term residents does affect the characteristics of the neighbourhoods, making it less likely for longer-term residents to want to locate in the neighbourhoods often because of an odd combination of students being too loud when they are present during term time and neighbourhoods being deserted when term is over.

In addition, I think that HMO overprovision restrictions cannot be done in the vacuum of looking at overall rentals as well. My street (Orchard Place) has some HMO, but otherwise has a predominance of rental properties - very few residents actually live in the homes they own. Thus, HMO is an underestimate of the challenges about renting.

I would certainly agree with such a cap on HMOs as proposed, as the community that once was in Old Aberdeen and elsewhere in the Census areas has all but gone.

I myself have lived in Old Aberdeen for over sixty years and where there once was a vibrant community spirit, where family's grew up together and respected the area and each other, has sadly gone.

With the spread of HMOs, the community has been blighted because when properties are on short term lets, tenants neglect the once tidy garden areas and certainly have no respect for their neighbours as they will be gone in a few months, so why bother.

With respect to my particular area, Spital Walk, The Orchard, where families lived and grew up, now out of term time, is deserted for several months of the year and becomes a ghost town.

There really has to be a limit set on HMOs, but perhaps a bit too late!

The main reason why I agree with the proposal is because the same policy has been very successful in Dundee where my daughter resides. There is stability, certainty with regards to the social make up in the areas as the landlords are happy because it gives a clear unambiguous message as to where to buy properties. When I first moved here in 2006 the area was very vibrant and mixed, students, academics, families, who all got on well with each other. It was an aspirational place for students and families to live here and students in particular liked the area. However over the last ten years the balance has tipped as there has been increasing disruption by a small population of students. Much of this is due to unscrupulous landlords who do not care about the socialisation of these students into a wider neighbourhood. There have been to my knowledge landlords who are not registered and who have let homes deteriorate. My own experience as a HMO neighbour involved time off my work with stress and exhaustion. A very poor landlord in the house above me illegally let the house to a group of very anti-social students. In turn this led me to let my own property for a short time. I now have it in writing from my own tenants that parties continued until 5am when the students term started, which stopped them getting sleep during a work week. It is disappointing the Students Union are framing this consultation as 'anti student' because no one will be disadvantaged. Besides many students work in town so do not have to be closer to the uni. Further they must know they cannot police anti-social students and this policy will not hinder

The area in which I live has altered considerably over the 30 plus years I have been a resident. Despite 'new' build housing in that period, it is not a 'family friendly' area any longer. This is due not only to HMO's but the number of properties which are now rented through lawyer's offices with the problems associated with absentee landlords.

**HMO Overprovision Consultation - Comments Received**  
**YES Responses - HMO Neighbours**

There is too high a concentration of HMOs in the Old Aberdeen area. They are needed, certainly, but should be spread further afield through the city.

**HMO Overprovision Consultation - Comments Received**  
**YES Responses - Other Organisations**

**Ashley & Broomhill Community Council**

Is consideration to be given as to how many properties a landlord has? If a single landlord has control over a large number of houses in an area, if no more are allowed he/she could take advantage of this and charge more. Similarly a one house owner could find it impossible to do this.

If the owner genuinely occupies the property, a more favourable view could be taken.

Is consideration to be given to the number of residents? An influx of temporary dwellers with no ties to the area may alter the dynamics of the community and have an effect on local services, eg medical practices.

Would it be possible to say that if there are more than 4,6 whatever, there should be a live in factor? this could be a resident of the house who pays reduced rent.

Could it be made a condition of a licence being granted that they :

1- keep the property in good condition and the garden tidy

2-are liable to lose their licence if the residents cause distress to neighbours (say 3 complaints to the police)

Rental costs could be approved in advance of the licence being drawn up to avoid overcharging.

Licences should be valid for a fixed term only as an encouragement to landlords to look after the property. If they fail to do that they risk losing their licences.

**Garthdee Community Council**

The position of the Garthdee community council is to support the policy to limit HMO overprovision. It has always been our view that high levels of students in our community both in terms of students leasing flats, HMO's and larger traditional family homes - that a 10 and 15 percent maximum provision is accepted

The community becomes half empty when the students leave during holiday periods while with a regular change over of new residents our communities integrity and cohesion.

Garthdee will soon have some 7000 dedicated student flats, which we support, but we believe our community cannot become a student village, where families lose out on gaining housing at the expense of more HMO's

**HMO Overprovision Consultation - Comments Received  
YES Responses - Other Organisations**

**Old Aberdeen Community Council**

1/ The maps, as provided, are fundamentally inadequate as they do not show the full extent of the area.

2/ The policy uses Community Planning Neighbourhoods as the area designation. Community Council areas would be much clearer to the public as these are

more widely known and understood and we recommend that these maps are used.

3/ The proposed boundary also fails in that it omits an important locality that feels itself part of Old Aberdeen. This is a part of Tillydrone Avenue - COA S00089607.

4/ The Policy should specifically list all the COAs that lie within the defined controlled area. A list by boundary only could raise complaints that the map was not clear etc.. further, some COAs are split by the drawn boundary - all COAs should be 'in' or 'out'. The maps (revised to show the complete areas of interest) should still be included, but there should be some means to permit the prospective landlord to find if a property of interest lies within a designated COA - perhaps a large scale map online, that can be zoomed in to identify what each COA encompasses?

5/ The incorporated maps show the existence of HMOs as red dots. This layer should be removed from the final policy document as some dots may become obsolescent.

**Kincorth & Leggart Community Council**

This should be put at a maximum of 10-15% of the population in an area

**Torry Community Council**

HMOs affect all communities and there is a need to place a limit on certain areas where over development has occurred

**Old Aberdeen Heritage Society**

Copy of the full response is appended to the report



**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Individuals**

Surely the area around a university is the ideal place for HMOs directed at students. As someone who previously lived in an area near a university I fully expected to be surrounded by student

I believe such a policy would discriminate against students and young people. As a young professional who moved to Aberdeen to study, and remains here, the availability of HMO properties is crucial. I currently share an HMO property with 2 others who live and work in Aberdeen, one of whom is a teacher (more of which Aberdeen is desperately in need of). Our neighbourhood is vibrant, and it is wonderful to live with a variety of people, from young families, to students, to old couples. The availability of HMO properties does not prevent families from moving in - only offers more options to those who cannot afford to rent alone, who are in Aberdeen to contribute to the city and make it the wonderful city it is. Perhaps those that have lobbied for this policy should rethink their decision to move close to educational institutions if they hold such hatred for young people.

Seems completely unreasonable to refuse HMO licensing to flats that may fulfill all safety requirements just because there are many other HMO properties in the area.

Students of both universities make up a large % of the community and contribute so much to the local economy, both in economic and social value. I believe to restrict HMOs to 10% in the areas surrounding the universities would be extremely unfair.

There is so much to be gained with living with your friends at university, outside of the system of halls: learning the responsibilities of paying rent, of responsible energy usage and choosing a supplier, of splitting bills, setting up a wireless network. These are all skills which need to be taken in account for later lives and are vital for the development of young adults.

Student's living in the areas surrounding the universities are as much a part of the community, and contribute towards it, as much as the other residents and should not be penalised against the chance to live together and the personal development the responsibility of private renting brings. Purpose built student residences are restricting this freedom, taking away from the traditional responsibility of renting. Having lived in Aberdeen for 4 years, with my first year in student halls and subsequent 3 in an HMO flat, the opportunity to live with a group of my friends set me up with my flat hunt and the responsibilities it brings once I graduated from AU.

The areas in question are very near the universities. Students prefer to live as a group as opposed to with just one other which also is (certainly from my own experience at university) a more harmonious living arrangement and cheaper for splitting bills etc. Putting restrictions will limit options for young people who will end up paying more. Also, it will be harder for landlords to let out larger properties meaning they might sit empty and be prone to break-ins /disrepair. Landlords will have to take a hit on rents to subsidise costs if there is say only two occupants in a large property.

As a student I have lived for several years in HMO properties. I wouldn't support any limit on their provision, and am very much enjoying the current lower prices engendered by overprovision.

With the recent fall in private rental sector prices, HMO-licensed properties are far cheaper to rent than halls offered by purpose-built student accommodation providers such as Unite and Hello Student, which can charge up to £12,000 a year per room. Further, many students wish to live in flats/houses not only because they are more affordable than private halls but also because they often offer larger living spaces, feel more homely, and enable students to live as residents within the local community.

It would almost exclusively prevent the poorest students from being able to attend university as they couldn't have affordable housing.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Individuals**

This is Unfair. There is already a housing crisis in Aberdeen, limiting an already choked system which allows students to live on the university campus is not just!

The price of housing in Aberdeen is already extortionate. Rent is extremely high for flats that are in a rather poor condition. Finding an affordable place to live is already a struggle for Aberdeen students, and this policy will only make it harder for students to make ends meet. I live at home in Aberdeenshire and travel around three hours everyday to get to Uni and back home because I can't afford to live in the city as rent alone is higher than the loan SAAS is willing to provide. My only chance of moving out and being closer to Uni is if I can live in shared accomodation with friends as it will ease the bills needed to pay. Many of my friends already work around 20 hours a week on top of full time studying and it barely covers their living costs. The council needs to start taking student's priorities into consideration because we have been financially struggling for too long.

Such a policy would be appallingly unfair to students, who already face financial issues, and create an artificial market to further take advantage of this group's vulnerability. It would be predatory and immoral to proceed, selling out a vulnerable group in return for property owners' profit.

Yes this policy is directly targeted in student areas. It's shame worthy that the council is forcing students out of affordable and better living conditions to support the companies who have created student halls who extort students with there expensive rental demands. The worst part is that they think the community is stupid. The student and local community will not stand up for these bullying and oppressive tactics. The council exists and is a civil servant body, so serve the local constituency not big companies.

Yes, the policy reduces flexibility for property owners by preventing them from letting their property. It may also increase the number of illegally sublet properties which no longer have the protection of HMO inspections (i.e. if there are a number of spare bedrooms in a property which is rented these may be sublet. With an HMO this property would be subject to standards but this would no longer be the case.)

Arbitrary caps are unproductive, and only seek to allow landlords to tightly control the cost of living in the city. HMOs have no negative impact on the rest of the city, and it would be damaging to the city's economy to take students for granted in this way.

Aberdeen has a choice about whether it wants to be a forward looking city that attracts skilled workers and people, or a city that's on borrowed time from the oil industry that you can't afford to live in. This policy would signal the latter.

Limiting HMOs would mean some students having to live in more expensive accommodation, or spending more money travelling across the city to get to University. With the recent fall in private rental sector prices, HMO-licensed private sector flats and houses are far cheaper to rent than halls offered by purpose-built student accommodation providers such as Unite and Hello Student, which can charge up to £12,000 a year per room. Further, many students wish to live in flats/houses not only because they are more affordable than private halls but also because they often offer larger living spaces, feel more homely, and enable students to live as residents within the local community.

I believe that HMO licences should be available to all properties which meet the requirements. To restrict this would result in higher rents for students and other users of HMO properties, many of whom struggle with money.

HMO Overprovision Consultation - Comments Received  
NO Responses - Individuals

This is very bad for students!

Until you build more affordable housing it is unlikely that this will have a successful implementation. It will lead to more illegal tenancies and force multiple occupants into Slum landlord occupancies. If it is the matter that the council requests more council tax then there should be a reform on the council tax implementation, in that students should pay a subsidiary for water , waste and refuse instead of no council tax. Being a student doesn't negate that you have a duty to the environment and to ensure public services are paid. If students are not working they should be exempt but if they are working during education they should pay a contribution.

Students are an integral part of the communities in which they live and to this city, this policy would make Aberdeen an unattractive city for these students

Absurd attempt to drive prices up for students in the area. This appears to be nothing but an attempt to corner the market for private landlords and student accommodation agencies to charge whatever they like for prices. I would not move back into the area if this policy proceeds.

It drastically raises the cost of living for students which is not only unnecessary but also the neglect of the care of the reasonable rights of the large student community.

This draft policy is both shameful and hurtful to everyone. Students already suffer a bad image, which should be addressed by getting to know their neighbours better and encouraging more social mixture. Ostracising never did anyone any good, and limiting HMOs will only produce more frustration and unease amongst communities and neighbourhoods. Scrap this project immediately.

10% does not seem too much.

Complete nonsense. HMO itself doesn't create problems. You can have an entire block of buildings full of students in HMO and it's dead quiet - walk past Spring Gardens at night, you'll see what I mean. There should just be a noise ordinance like in most places on the continent, forbidding excessive noise at night (say between 10 pm and 6 am) unless permission is obtained from all neighbours. That way, I fail to see how anyone could be negatively impacted by HMO.

## HMO Overprovision Consultation - Comments Received

### NO Responses - Individuals

I vehemently disagree with this policy. It seems pointless - what issue are you solving with this? There are real housing issues such as homelessness/adequate number of homes/landlords who flout the rules etc. which the council should be focusing on instead. Think about the number of students and other groups who currently live in HMO flats/houses in the areas you are proposing - do you really think there is enough space for all of them outside of these areas or in the 'student accommodation' premises? I think we can safely assume the answer would be no.

99.9% of students are courteous, great neighbours who add value and diversity to the community they live in. Don't advertise as a university/student friendly city if you're going to impose policies like this. Once again young people are the ones being disadvantaged for no good reason.

It's a good thing students and groups of friends etc. want to live in local communities in real accommodation. If this policy is imposed it will destroy the communities surrounding the universities - students will have to live further away for more money. I graduated recently and I cannot tell you how nice it was after having lived in purpose built student accommodation (which was small, expensive, overpriced and low standard - and I'm far from the only one who thought so) to live in a 'normal' (for want of a better word) flat in the heart of the city centre with my best friends. Rather than having mere 'accommodation' we had a HOME. And because we could all live together we had our own little family as well. I know many others who are/have been the same way during university. University can be tough, and being able to go home at the end of the day to a comfortable, large, airy, reasonably priced place filled with friends rather than no-one or random people (such as can happen in these 'student accommodation' buildings) makes all the difference in the world. By implementing this policy not only are you taking money out of young people's (and their parents) hands, you are also ripping friendship groups apart and denying students an essential part of the support system and social network which exists at university: friends. Living in a 'normal' flat with my friends has been the best few years of my life - don't stop others from having the same experience. Some might think this is over-dramatic but think back to a time when you lived with friends and how much fun and how pleasant it was. Students and other groups deserve to be allowed to live in normal flats/houses near to their studies with their friends. It's that simple. Please do not implement this policy - focus on more important issues/policies which solve an actual problem.

It is discriminatory

I don't think this is appropriate, either for the majority of the rental market in these areas and also for landlords as it will remove potential renters. These areas are predominantly student areas and lowering the number of HMOs will force them to move into overpriced purpose-built student accommodation such as Unite (which should never have been given such permission to build as many as they have). These accommodation companies are quite frankly predatory in the prices they charge for students with limited options, and penalise those looking to educate themselves.

From a landlord's perspective, with the number of professionals renting substantially reduced due to the oil and gas crash, students are a large part of their potential rental audience. Reducing the number of HMOs penalises landlords who rely on student rental income.

Such policy are only made to help out the owners of the large scale student accommodation and forcing students to pay for their investment is ridiculous. It should be left to the student to decide where he or she would like to stay, then forcing them to take on these expensive accommodation.

It will raise price of properties unaffected and penalise poor students and workers who cannot afford highly priced purpose-built accommodate. It will curtail the supply market, increase demand and raise prices. It will distort the economics of the market.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Individuals**

There should be an open and transparent system for granting HMOs (and other licensing issues) and the local government should not be implementing further rules to try and restrict the freedoms of its citizens. In this case the economic freedoms of its citizens.

To 'future proof' the policy on the overprovision of HMO's it should apply to COA's in all neighbourhoods

It doesn't just affect students its also unfairly affects young professionals who want to save to buy there own property but in the early years of there career shared accommodation with friends is the only way to balance the books to account for savings for future investments to set down roots in these community's. The proposal is short sighted in dealing with the long term problem of decreasing wages and increasing rents.

A rent cap would be more effective in dealing with the problem in full and allowing young people to have the ability to save to buy property long term and invest in those community's.

This policy seems to have a disproportionate impact on students, with the focus on areas around Aberdeen University and Robert Gordon University main campuses. I live near Aberdeen University campus and appreciate that students are a big part of the local community.

Purpose built student accommodation is often unaffordable for many students. But not only that, it has the effect of segregating them from the local community which is worse for the community and for students themselves. Where you have big blocks of 'student flats' like Ardmuir or Unite, you generally have more noise pollution compared to when students live in real houses and know their neighbours and are more considerate of them.

I think st

Aberdeen, as a city, benefits greatly from its two universities, and yet the council seems intent on punishing people who study here. You can't have universities in your city without expecting students to live near them.

The policy seeks to unfairly discriminate against individuals who have no option but to consider shared accommodation as a result of personal financial constraints. Aberdeen City is an expensive location in which to live due to relatively high rental prices, exacerbated by wage stagnation and the impact of inflation as a result of current economic conditions. The policy risks discriminating against those who cannot afford to rent accommodation as a sole or joint tenant and for whom a room in a HMO licensed property is the only feasible option. Furthermore, the policy risks impacting on individuals beyond the student community, particularly those who have moved to Aberdeen from other European countries to seek employment and those for whom high-paid employment is simple not a reality or an expectation. While the proposed measure does not seek to reduce the current level of HMOs, it does place an unnecessary restriction on the future accommodation offer in the identified areas and potentially risks denying access to low-cost housing for individuals who can afford it the least.

These HMO are there for a purpose and must be needed as an ex- student I would not of been able to study

If I had to use student accommodation it would of cost me twice as much in what I pay in rent which is for and 3 bedrooms, own living room, kitchen and bathroom not a room and shared kitchen and bathroom

Students don't get rent rebates on student accommodations but can if they are in a HMO or rent a house

## HMO Overprovision Consultation - Comments Received

### NO Responses - Individuals

Seeing as the university offers accommodation at rates that are not affordable for a significant number of students and seeing as the student influx to Aberdeen is a huge source of profit for the city I can not possibly agree to the fact of limiting opportunities for the housing of students at affordable rates.

As an international student, HMOs do not appear to the warm, welcoming environment advertised to me when I first moved to Aberdeen. HMOs only make it difficult for international and domestic student to function effectively at the university.

Students do not have a full time job, they do not have a full pay, let them live instead of trying to make them poorer. Accomodation shouldn't a be a luxury, the council has to honest, Unite and Hello Student are a mistake, too small, too expensive, not everyone have £12,000 a year per room, it is insane. Students in the city should be an opportunity for local businesses around not some shareholders and builders of useless buildings.

You were happy and not complaining when the oil industry was at its peak, money was flowing and you didn't even prepare for the future of the city, now that the british government have injected 500 million of pounds for the city to counter the oil crisis you are asking to students to pay. The rents 2/3 years ago did not reflect the market, they were high whereas in the city there are 50,000 students.

Do not take a decision you are going to regret, many people are already struggling working and studying at the same time. Living shouldn't be a priviledge but a right.

Surely this is an entirely inappropriate way to measure HMOs, 10% in specific areas. Areas with universities will naturally have more students requiring shared accomodation. This policy will have significant financial implications to landlords, in a climate that is already struggling with the oil downturn. There are implications to students in terms of access. Students actively support the economic prosperity around RGU and Aberdeen University and should not be made a target of through Council Policy.

Additionally, until the council decides to address the appalling state of public transport, and specifically the un-affordable monopoly that First Bus holds within the city, then close accommodation to the universities will always be required and should not become a target. The alternative will be higher poverty in an already challenged population.

Private landlords offering affordable accomodation to students should be praised and celebrated rather than companies such as UNITE and Ardmuir being given a free pass. This policy will result in high rent prices and large, concentrated, highly transient populations who can offer no contribution to the local community (as they are often only available on 9 month contracts). This will alienate students further from the Aberdeen community. These companies also request illegal non-refundable deposits and to see the council backing them is deeply sad. Private landlords tend to be local and the individual rent can then be reinvested in the community.

Aberdeen City Council should be ashamed at the blatant targeting of specific individuals in the formulation of this policy.

I think it is correct for HMOs to be managed correctly, however, it is a university area therefore a provision of university accommodation should be provided. Cities such as Edinburgh and Glasgow have an abundance of HMO properties whilst there is a real shortage in Aberdeen. I lived in a very small house which had an HMO. Living standards were not sufficient yet it was the only property we could find.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Individuals**

<p>I feel that introducing an overprovision policy in these areas of Aberdeen will have a serious and negative impact on the communities that live there.</p> <p>As a youth worker who has spent nearly 10 years working in various areas of England and Scotland (including, recently, Aberdeen) areas with high levels of students and HMO properties are rarely as high in levels of crime and antisocial behaviour as areas without. Beyond that, I feel it is important for the community as a whole to have a variety of people from different backgrounds making up that demographic. Students - particularly in Aberdeen, are diverse and multinational, something that only serves to reinforce the international, welcoming feel of the city.</p> <p>In addition, I believe an over provision policy in Aberdeen would force students who already pay exceedingly high rent, into poverty. Rarely do you find students who study full time, and who do not also have a part time job that is REQUIRED for them to be able to pay their bills and put food on the table. Forcing them into expensive single occupancy properties or purpose built housing will add additional expenses that they will struggle to afford. Not only is this unfair it works to discourage students from attending university in Aberdeen either at RGU or at the UoA.</p> <p>In my nearly 4 years of working as a Youth Worker in Aberdeen - our target age group ranged from 11 - 25 years of age. Considering most students are aged 17-24 , never once in that time was I called to a situation where students were involved. On occasion we worked in the Powys, Sunnybank, and Froghall areas, as well as occasionally in Garthdee, but the young people who needed extra support and help due to more antisocial behaviours were never the students who lived in these areas. Aberdeen City Council could spend significant time working in and addressing more serious problems in other parts of Aberdeen City, instead of targeting areas who traditionally have been harmoniously shared by students and members of the Aberdeen community.</p>
<p>It is discriminatory.</p>
<p>It discriminates against students.</p>
<p>It discriminates against students.</p>
<p>While useful for ensuring that areas around the universities do not become student suburbs, the actual concentration of students in these areas is currently pretty low compared to other university cities, and the proposal serves to maintain a market for the over-priced purpose built student accommodation.</p>

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Individuals**

Surely this is an entirely inappropriate way to measure HMOs, 10% in specific areas. Areas with universities will naturally have more students requiring shared accommodation. This policy will have significant financial implications to landlords, in a climate that is already struggling with the oil downturn. There are implications to students in terms of access. Students actively support the economic prosperity around RGU and Aberdeen University and should not be made a target of through Council Policy.

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Aberdeen City Council should be ashamed at the blatant targeting of specific individuals in the formulation of this policy.



**HMO Overprovision Consultation - Comments Received**  
**NO Responses - HMO Landlords**

An overprovision cap might have a negative effect in that it will limit the offer of shared accommodation and once the demand catches up, it will lead to increase on rental price as there are no more HMO properties available. This will also result in a drop in the quality of the HMO housing on offer as landlords won't have to try very hard to let their properties as there are no more available. HMO properties might become gold dust as it has happened in other parts of the country like Cambridge with detriment to tenants.

In my opinion it is a mistake-is arbitrary & discriminatory- treating such persons in effect as "undesirables".It will push rents up for the Public & Drive LANDLORDS out of the market. Where is "evidence" that this is needed?

We are active members of the Scottish Association of Landlords and we would agree with their response as below:"The policy is unlawful as it contravenes clause 131A (4)(b) of the Housing (Scotland) Act 2006 which states that the local authority must have regard to the need for housing accommodation in the locality and the extent to which HMO accommodation is required to meet that need in considering whether a licence should be refused due to overprovision. The policy as drafted does not have regard to the need for housing accommodation in the locality.If the policy is to be introduced, the local authority should publish on a monthly basis the number of properties, number of licensed HMOs, number of pending HMO renewal applications and the number of pending new HMO licence applications in each of the census output areas affected by this policy. This will allow landlords to make an informed decision on whether to invest in property/apply for a licence.Exemptions - properties which have previously held a licence in the last two years should also be exempt as this will ensure that properties where licence renewals have been refused or where landlords decide to allow the licence to lapse for a period to operate the property as a non-HMO can reapply at a future date without being affected by the policy."Additionally we would add:Accommodating students in HMOs near to their universities is more sustainable in reducing the need for travel and therefore the impact on the environment and the city's transport infrastructure. Any cap on numbers in a particular locality which is not based on demand/need could jeopardise this sustainability.Despite the often negative perceptions of the occupants of HMOs, there are many positive factors allied to this group, including the support they provide by patronising local shops and services and the extra employees they provide to the labour market. There is often an assumption that all HMO tenants are students but we have a number of young professionals in Aberdeen who cannot afford to live in non HMO properties and restricting the availability of HMO properties will affect the ability of this group to live/work in the city and contribute to the economy.If fewer HMOs are available near Universities then a larger number of smaller properties will be needed to accommodate tenants. These would fall outwith the HMO regime and therefore the local authority would have less control over standards of safety, accommodation and management. A higher density of rental accommodation with non-resident owners could also lead to a higher prevalence of difficulties in organising communal repairs and therefore a deterioration in the quality of the housing stock.Young people typically prefer to live in large groups of friends. By restricting the supply of properties large enough to accommodate such groups, there is a risk that they are driven underground. It is already common place for young people to rent two bedroom units and covert the living rooms into third bedrooms without the knowledge of the landlord. This leads to overcrowding which is not only a safety issue but can lead to more incidents of anti-social behaviour. This in turn has a far more negative effect on neighbourhoods, leading to greater resentment of the student population. Restricting the supply of HMO properties will also lead to rent inflation for any other properties that will accept young people/students, such as already licensed HMOs and purpose built student housing. This risks it being unaffordable for young people to live/study/work in the city with knock on economic impacts for the locality.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - HMO Landlords**

This is a terrible idea.

HMO's are already the highly regulated. They have been brought in primarily for the SAFETY of people living in them. As a result of this they are extremely safe, where all aspects are regularly checked by a team at the council.

For example- fire doors, emergency lighting, smoke alarms, gas safe checks, PAT testing, minimum sizing of bedrooms.

Non HMO properties would not have all the above safety measure in place and checked by the council on a regular basis.

To put through this "Over Provision" policy, will only drive "rogue landlords" underground and would potentially put lives at risk. The council should concentrate of keeping the "good landlords" such as myself and clamping down on the "rouge landlords".

This over provision measure has been instigated by a highly vocal minority, who only agenda is to stop any property being tenanted by students, this is blatant discrimination by them.

If you decide to move to a property near a University, you should expect students to live near you.

Students have a right to live near their place of study.

This should not pass

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Landlords**

These policies have demonstrated again and again lack of effectiveness preventing the spreading of HMO. Once an overprovision policy is in place, the illegal HMO start spreading even further because the council does not have the means to prevent them and effectively control them and secondly because the underlying cause is still there, which is lack of affordable accommodation close to Universities and city centre.

**Exemptions from the Policy**

1. New-build, purpose built HMO accommodation such as student residences and developments covered by Section 75 agreements under the Town & Country Planning (Scotland) Act 1997 which restricts their use to HMO accommodation.

Instead of granting permission for more new builds in the City (Powis place, George street, Froghall etc) Council should try and help improve the existing areas. New builds are adding chaos, parking and other issues however if the existing builds are granted permission instead and council focusses more on regeneration and improvement of these areas it would be deemed a better decision!!

These policies have demonstrate again and again lack of effectiveness preventing the spreading of HMO. Once an overprovision policy is in place, the illegal HMO start spreading even further because the council does not have the means to prevent them and effectively control them and secondly because the underlying cause is still there, which is lack of affordable accommodation close to Universities and city centre.

I do not agree with the draft policy. I do however believe that there should be more emphasis put on the quality and guidelines of HMOs in these areas. This would separate the good landlords from lazy landlords.

This policy would have a knock on effect of limiting student accommodation and cause rents to rise for this group who are the main class of tenants in these areas.

It discriminates against students

HMO Overprovision Consultation - Comments Received  
NO Responses - Students

Limiting the number of HMO licenses will be greatly detrimental to students and others wishing to rent. Although new student accommodation has been built, it is insanely priced at over £600 a month for a room. Not many people in employment would pay that, let alone students who do not have the time to hold down a full time job whilst in their studies. There is a need for cheaper accommodation that HMO properties can fill.

If HMOs are limited, this WILL price people out of university as living costs will be too high, and the number of students at universities in Aberdeen will fall as a result.

Why move students away from regions essential for getting to university.

Will also push up already despicable prices for HMO properties.

Instead focus on improving the quality of HMO properties as they are often of poor standard

This policy will discourage people from applying to the university of Aberdeen and RGU as it makes the council's anti-student stance clear. The council should be encouraging the student culture in Aberdeen to grow as it makes the city more vibrant, provides customers for local businesses and ultimately will be around longer than the oil workers will.

Think it is ridiculous to try and limit the number of HMOs in these areas. They are located near universities, and are in ideal location for students. It is hard enough for students to find accommodation in our city especially with rent prices so high, and taking away low rent locations is not helpful.

Finding HMO properties in Aberdeen is always difficult. Having been through the process twice now I know this policy would negatively affect student living standards and student satisfaction.

The areas mentioned offer some of the best, most affordable accommodation for students, especially students of the University of Aberdeen to live.

Removing these HMOs will force students to look further away that they want to live, and possibly into worse accommodation.

Aberdeen should ditsy livable for students

This would only limit housing to students. Students that provide so much to the community. They volunteer and bring money into the Aberdeen economy. By driving them away with this HMO bill, you are taking a valuable part of the Aberdeen community away.

It is simply already too expensive to live in Aberdeen. Having less HMOs will mean less students can afford an education, this should definitely be opposed. Education is a fundamental right.

The cost of rental accommodation and private student halls in Aberdeen means that for many students the only affordable option is to share a private rental flat with multiple people. Limiting HMOs will make this harder, force students to live further away, or encourage students and/or landlords to lie to avoid having an HMO in the first place.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

I already have to cycle from Torry to Kings college every day because I can't afford a home nearer to campus, so decreasing the number of options students have to find an affordable home is definitely a step in the wrong direction.

It would be far more beneficial to strive to increase student engagement within the community, than attempt to limit there options of staying in the area surrounding the university, a university which hasn't exactly appeared in the community overnight.

Ridiculous idea. Supposed to be encouraging an influx of young minds to study at Aberdeen Universities, how does reducing the amount of flats open to them do this?? I speak from previous experience that it was difficult to find a HMO flat within proximity to the University (given the vast amount of students searching for such properties) so the idea to further reduce this is absolutely absurd.

This draft will make it even more difficult for students to find accommodation in this already over-expensive city. It is a direct attack for students and independent young people with less money. Most Students participate in the community, work and are a valuable part of the city.

In addition, this draft will potentially increase the price of accommodation in normal housing too, which really does not help the cities economy nor it's citizens.

Please consider carefully what you are doing and whose interests you are benefiting.

This policy would affect students negatively. Both halls and private accommodation in Aberdeen are very expensive and HMOs are far more affordable. Limiting their number will result in decrease of the affordable accommodation options for students.

HMOs enable students to afford to live in close proximity to the University campus with their friends.

The vast majority of students are friendly and do not cause disturbance to their neighbours.

Pushing students out of Old Aberdeen will cause problems for many people.

Why is this policy only being applied to the areas surrounding the two universities in the city? Surely this is just a way for the council to force students into student accommodation?

Private rental options should always be an option and this will reduce the amount of option for students.

Why is this policy only being applied to the areas surrounding the two universities in the city? Surely this is just a way for the council to force students into student accommodation?

Private rental options should always be an option and this will reduce the amount of option for students.

Clearly unfair to students, based on biased views of students "destroying communities" according to Old Aberdeen community councillors that help no one and do nothing to encourage community between students and other residents. Students are the main renters of HMO properties and this policy discriminates against them, they are also the main people buying and using goods and services in these areas and are of huge benefit to the local economy.

## HMO Overprovision Consultation - Comments Received

### NO Responses - Students

This would drive up the price of accommodation available to students, forcing up the price of private rental properties some of which are already over the average amount of student loan. For Aberdeen City Council to introduce such a policy would be outrageous and would be detrimental to the relationship between students and the community.

The HMO Overprovision Policy would limit the possibility for students to live in shared accommodation, shared by more than two people. This would mean that a large number of students would have to live in more expensive accommodation, often not affordable for them. This could cause them to accumulate even more student debt, or even make them leave Aberdeen. The housing prices in Aberdeen are already very high for students. Limiting the option of more affordable accommodation might hinder students to receive the quality education that is offered by the universities here in Aberdeen. Education is a fundamental right, and should not be reserved for those who have the privilege not to be held back by high housing prices.

Students appreciate the great environment that Aberdeen offers them for their studies, and I believe that they contributing to the city's vibrant and active communities. This should be supported to benefit the whole city, and the overprovision policy is not an act of support.

This policy would be absolutely disasterous for Aberdeen's student community. The student community is what keeps Aberdeen vibrant, interesting and alive. How many cultural events, cafés etc. are sustained by the large student community? The student community, a large part of which is made up of foreign students, is being squeezed at the moment between university accomodation fees that are spiralling out of control and new regulations due to Brexit. The relatively low rent that we students are paying for private shared accomodation, HMO's, is one of the few things, apart from the university and the student community itself, that still makes Aberdeen attractive to more students.

I think it is going to really unfair and bad for the communities if implemented.

Disproportionate effect toward students. Private purpose build accommodation is grossly over priced and as such should not be encouraged as a long term solution for student housing

Limiting the number of HMO properties in areas surrounding the universities will make being a student in Aberdeen even more expensive. While purpose built student accomodation exists, it doesn't allow you to actually live in Aberdeen, limiting the time you can live here to only the academic year, and charging you far too much for it. HMO properties around the universities make being both a resident and student in Aberdeen a much better experience, and save students a lot of money.

As a student, living under not ideal financial conditions I find this appalling that it is deemed a good idea to decrease the amount of HMO, in areas which are close the to university and often dedicated for students, like me, who need cheapest rents that those offered by students accommodation such as Hillhead( cheapest is 99/week) or Don Street ( 121/week).

Students are an important part of the community, they volunteer, organise events and are impact the local economy. By accepting this policy, we would make more difficult the already stressful task to find affordable rent.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

The policy aims to prevent "excessive" concentrations of HMOs around the universities, by imposing an arbitrary 10% limit, but does not explain the need for, or the benefits of such a policy.

The current HMO scheme, requiring a paid licence, already raises rents and limits supply of student-accessible accommodation and restricting it further would affect the poorest students the most, as shared accommodation is currently cheaper than university or private halls of residence.

Matters regarding overprovision would be better left to a housing market based on supply and demand rather than a decision of the council.

The whole idea seems unnecessary. Why would the council want to push students to a more expensive and less homey accommodation.

This proposal is clearly aimed at cutting off the ability for underfunded students in student rich areas to live within a community - something already lacking in Aberdeen compared with other University cities - and at a reasonable price. Likely this is a capitalist driven idea given the recent economic downturn in Aberdeen. Needless to say this is disgusting and targeting the poorest people in the city - the students, is something that I would expect from a Tory government, but not in Scotland. If the council is lacking in funds I would suggest it turn to those who have profited the most of their fortunate events and have the resources to give up rather than people trying to start a life for themselves in a failing country.

Limiting the amount of HMOs will drastically and negatively affect student experience and the possibility to make Aberdeen City Center vibrant.

Student life is expensive enough.

Although I do not live in Aberdeen currently I have spent 4 years in Aberdeen in rented housing in Old Aberdeen. I believe that an HMO Overprovision policy would be damaging to students and would be a deterrent for those wishing to move to Aberdeen for university. It is important to encourage students from low privileged backgrounds as everyone deserves a fair chance at university and to live in affordable and private rented properties.

Students are already struggling. What justifies a policy that makes life harder for students, who are the only reason why Aberdeen's night life runs

It doesn't take into account the needs of people and students living in the targeted areas.

Reducing/limiting HMOs will negatively affect student (and other people who wish to live in shared housing) in many different ways. Not only are student halls too expensive to be affordable over a period of 4 or more years but spaces in halls are limited. Not having the opportunity to live in a private flat rather student halls and not being able to live with other people may impact young people's wellbeing as well as their academic success (amongst others aspects). Having better housing opportunities- especially for young people- will increase the appeal of moving to or staying in Aberdeen rather than moving to other places that offer better housing opportunities. Ultimately Aberdeen, just like all other cities, relies on next generations to sustain it. If it does not provide good quality housing and living opportunities it will not be attractive for future generations.

HMO Overprovision Consultation - Comments Received  
NO Responses - Students

HMOs are bad enough as they are... II
Finding suitable HMO properties in Aberdeen at the moment is difficult enough at an affordable price. There are two universities in Aberdeen and Colleges that require affordable and safe HMO properties. Introducing less HMO properties will make it even harder to find places to live.
As if students are hated enough by many local residents, this would further distance students from local communities.
Not fair on students who already have many costs especially those paying £9000+ for fees.
No
As someone who has been recently searching for a HMO property I found it near impossible to find a flat. The introduction of this overprovision would make it even harder and cause unnecessary stress for thousands of students. Aberdeen is a city that is highly populated by students and you would be failing them by introducing this.
Finding affordable housing in Aberdeen is already difficult and living close to university is already essential since public transport is not affordable for a student on an everyday base
Do not change the current HMO policies
Students need HMOs and it allows them to affordably live near the universities and integrate with the community.
Limiting HMOs in the mentioned areas will have the effect of forcing students to either: a) Use more expensive private accommodation e.g. Unite halls of residence, allowing the further exploitation of students' lack of choices regarding accommodation, or b) live further from University, resulting in higher travel costs. Aberdeen is already an expensive city to live in, let alone on a student loan. This policy will add unnecessary living costs.
Completely useless policy that directly targets students for no reason other than to not allow students to live together as if students living together is such a bad thing that a policy needs to be put in place to prevent this.
With Brexit, this policy is much same and students especially international ones are cutting back in number to other places, ie. Canada and Australia where policies are inclusive, diversity is opportunity and acceptance. This is so much Tory like.



**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

This seems to be targeting students and an attempt to force them to live in more expensive accommodation and live further out of their campuses

This would directly and negatively affect university students, as the areas targeted are directly surrounding the university. It would increase the cost of living for students.

It would negatively effect students-most who already have enough stress financially. Education is vital and making it more expensive excludes a large group who have a lot to offer.

Limiting the number of HMO's will lead to rises in rental prices and discourage students from coming to Aberdeen. Aberdeen needs students to support the economy of the city as the oil industry cannot be solely relied upon. Students have been a part of the city of Aberdeen since 1495 and it would be an outrage to discourage people from being educated in this great city.

It would be very difficult for students to find good and affordable accomodation without being burdened by debt

It's not exactly great...I mean, it definitely screws over a lot of students (like myself) who want to move in to a flat for the coming year.

Restricting the ability for students to rent places around the University is not only ridiculous, but limiting for the city itself. So long as students follow the agreements made with landlords and pay their rents appropriately, there is no reason to limit anything. We provide a lot to the city, and being forced into more expensive accommodation because of of some ridiculous law is not right. Those that think this is beneficial to Aberdeen have clearly not thought enough or only thought of themselves and the financial benefit they may gain from this.

This would place further financial limitations on students already struggling with budgeting for houses, food and other services, which are all becoming more expensive. This would only hurt the most vulnerable young people in society and the policy should be seriously re-thought.

Limiting HMOs would mean some students having to live in more expensive accommodation, or spending more money travelling across the city to get to University. With the recent fall in private rental sector prices, HMO-licensed private sector flats and houses are far cheaper to rent than halls offered by purpose-built student accommodation providers such as Unite and Hello Student, which can charge up to £12,000 a year per room. Further, many students wish to live in flats/houses not only because they are more affordable than private halls but also because they often offer larger living spaces, feel more homely, and enable students to live as residents within the local community. This policy is only targeting the areas of Old Aberdeen, Froghall/Powis/Sunnybank, and Garthdee – the three areas directly surrounding the two Universities in the city. Students give so much to the community, and we need to ensure that we are not shut out.

HMO Overprovision Consultation - Comments Received  
NO Responses - Students

This seems like a deliberate, callous attack solely on areas where there are more students living. With Aberdeen appearing to already be a city that is struggling to sustain shops and amenities, it seems both ridiculous and self-punishing to create what will basically be a city where no students will be able to come, because all accommodation will be private and at a cost of £12,000 a year. This is a policy which appears to only serve the private student accommodation sector, and would turn Aberdeen into a further mockery. It is also worth noting that HMOs are sought out by many different groups of people, not merely students.

The rent in Aberdeen is already high. By making it even more expensive, students will have to work more to afford it, which means less time to study and worse results. In extreme cases, students might have to drop their studies.

I pay a lot of rent already. I can't afford to pay more and will need to leave the university due to costs if this happens.

It's simply shutting doors of university on students, especially international students. I strongly oppose the policy.

It seems students are being disproportionately targeted by this policy. Private HMO properties are an affordable option for students who cannot afford inflated prices for earmarked student housing and wish to live close to the universities in the city. They also mean students are paying rent to local landlords as opposed to bigger corporations who divert rent money outwith the city.

HMO properties are currently the only way students can stay in relatively affordable accommodation, with companies such as Unite charging extortionate prices. Giving them a partial monopoly in this sector will only drive their prices higher as students have no other options.

Why are the council actively targeting students? When we give so much to the city of Aberdeen. It's because of us your taxis are running, your city centre is sprawling and your parks are full. Aberdeen is long past its heyday, no more oil companies and no more investment, so why are you targeting students? The one group that is a surety year in year out. Why? Why? Why?

As a student this policy could hugely affect myself and friends in a detrimental way. Aberdeen is already an expensive city to live in, we don't need policies like this to increase the cost of living even more.

Without flats with a HMO licence I would not have been able to afford to live in Aberdeen for university, as I supported myself, with no help from family throughout uni. Accommodation with HMO licenses also make the time at university more homely for students who may otherwise leave to transfer to other universities.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

The draft policy limits the ability of students to live in Aberdeen affordably and targets the student population close to the universities in the city. By enacting a policy that makes it harder for students to live outside of halls (which are already ridiculously expensive), this policy limits the possibility of student involvement in the community. Limiting student involvement in the city community means that students are less likely to put down roots outside of the university, and thus likely to leave the city after graduation, which means the city loses its bright young talent.

With the implementation of the policy, home owners who are entitled to HMOs would also increase their rental because of the decrease in supply of HMO entitled houses, and tenants, especially students, would suffer as a result. As there are many students living around the city of Aberdeen, especially in areas closer to the university or the hospital (medical students), the welfare of students should be considered in this case.

Reducing the amount of HMO properties in general would lead to a lot of part-time workers and students away from living in Aberdeen, hurting education and many businesses in the area.

Many students fall into low income categories and struggle financially through university as is. If creating further problems for these people is what the council is after, then it seems they're on the right track.

Housing is already too expensive in the city and you want to limit availability to pricing goes up even further! We need more property and more competition so that the consumer gets the best deals. Currently being ripped off as is.

I am afraid it will cause me to move out to a different part of the city that would be away from the university. Moreover, it was already hard to find accommodation close to university that wouldn't be overpriced. HMO policy in Scotland is already extremely strict compared to other parts of U.K., meaning that if me and my friends want to live together (just 3 persons) we need HMO flat. If the new policy will be introduced, a lot of students can struggle even more with the rent or have it harder to travel to university. In my neighbourhood all students are very responsible and quiet, we are also engaged in the local life, meeting with older neighbour, celebrating holidays together.

Rediculous policy, students in Aberdeen already suffer from high rental prices, lack of decency accommodation. Landlords are able to screw over students for insane amounts of money and this will further allow the exploitation of students ...

It's kicking students of the two universities out of affordable houses. Nobody should be forced to live in purpose built student halls which charge extortionate prices. Aberdeen is expensive enough as is, let alone for those students from poorer families/families that do not want to pay someone through uni.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

I believe HMOs are not necessary in the first place- why should a house containing 3+ students require a special license and safety modifications when a family home containing the same number of people does not? Shouldn't the same regulations apply regardless?

Secondly, why is it considered "excessive" to have a lot of HMO properties in the city? What harm is this doing? It is more harmful to the city to prevent students from acquiring affordable accommodation; if living costs in Aberdeen are too high it will put off prospective students. Aberdeen's student population is essential to the livelihood of the city. We encourage development, keeping the city young and lively. We make up 1/5 of the population. We have built our own community there and that is made possible by our ability to live with our friends, and have enough money left over to re-invest into the city by using its facilities.

This policy would limit the amount of affordable private accommodation for students and that is unacceptable.

Will hit students from poorer backgrounds more - increasing inequalities in accessible education

Ridiculous. Not many students have cars with them when they live in Aberdeen during term time so lack of parking cannot be an adequate reason. Students give a lot to the local economy especially during the low oil prices and the impact this is having on the community in Aberdeen. Last thing council should be doing is deterring students from studying in Aberdeen.

Student have too much financial burding, and i hope this intension will make it worse, student give a lot to the city, this will make student lose interest in studying in this city.

IT IS COMPLETELY ANTI-STUDENTS AND A WAY OF UNDERMINING THE STUDENTS THAT ARE GIVING SO MUCH ALREADY.

I think it's disgusting. It's hard enough as it is for students to get affordable HMO accommodation, this is going to make it even harder. Halls are exorbitantly priced in Aberdeen and if this goes ahead, we are going to be forced to live in halls throughout our studies because HMO properties will barely be an option. It took months of searching against all the competition to get a 4 bed HMO this year on Clifton Road near Old Aberdeen. What's wrong with having many HMOs in one area? In areas around Old Aberdeen it's more appropriate for students to live anyway.

It is the most ridiculous draft policy. Not only is accommodation expensive enough and putting students into living on a very low income it also affects the students health. Having lived in uni halls already I know fine well how living in halls is very unhomey, lonely at times and uncomfortable/unsuitable living spaces. I couldn't think of anything worse than having to live in halls again especially with the rising price in accommodation for students!!!

There is no reason stated for the restriction of HMO licences. A larger number of HMO properties could improve the market and force slum landlords to improve their properties.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

Policy directly hits students, making finding a affordable place harder for those who very often struggle with their financial situation already

As a student I am worried that the policy could limit the availability of HMO licensed flats, which provide students with affordable housing. Since the policy targets areas around Aberdeen University, some students would either have to move farther away (thus spending a considerable amount of money on transport) or to student halls, which are often more expensive than private flats and even unaffordable to many students. I hope that our ability to live within the local community will be considered when deciding about this policy.

It is not correct to force student to live in the student-built accommodations that are much more expensive and less comfortable. Renting a private flat/house gives opportunities to interact with the consulate and community which is a big advantage for me as an international student

I don't understand the problem. There aren't enough HMO properties as it is!

I think the students have rights to decide which place to live , and the government should not intervene the choice made by students.

The Aim section is completely garbage. Groups of students living together can be annoying but that should not be dealt with this way.

Limits the number of affordable flats that students can rent near the University of Aberdeen. It's convenient for students (since more affordable) to live with their friends, and therefore this HMO policy would be harmful to me and other students.

Will only really drive up rental prices for students which are already ridiculous during the past 3 years I've lived in this city.  
It has been close to impossible to find rooms under £400 pm excluding bills

Application of this policy will raise the already high price of HMO accommodation especially for students.

A HMO is important to ensure humane loving standards and create clear communication between tenant and landlord. Limiting HMO provision puts tenants at risk of high costs and unsafe tenancies

It is not clear what communities and individuals will gain from introducing an HMO overprovision policy.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

This policy would be an attack on those who are already financially vulnerable. If approved it will serve only to increase the economic divide. Furthermore, it would be yet another barrier to higher education for the socially disadvantaged.

Aberdeen is a city with a large student population, it is already a very expensive city to live in, and reduced HMO grants will mean students will most likely have to look for more expensive accommodation or have to travel further. This could affect the number of students coming to Aberdeen. It is also a ridiculous policy, and appears to offer no evident advantages, just discrimination.

It has the potential to create an unfair and unaffordable living situation for students as it could lead to increased prices on accommodation and a low availability of flats/homes that will accept students. In addition to this, it could cause the need for students to live further out of the city in Aberdeen, thus meaning that it would be expensive and time consuming to travel to and from university.

Having lived in Old Aberdeen (albeit in university accommodation) for one year and two different HMO properties in Sunnybank over the course of my studies, I feel that it is important that students are not shut out of private renting, which the suggested policy would certainly contribute to. As university halls are usually not on offer after the first year of study, students whom are not from the area need to find other accommodation. Not only are there not enough rooms available in places such as Unite for everyone to choose these options, but they are comparatively far more expensive than private rental. Living with others reduces the cost of rent in an already extortionate city. Unfortunately, living in two-bedroomed flats often doesn't reduce the cost enough. For many, even the maximum student loan does not cover the cost of living entirely and it is necessary to uphold a part-time job alongside full-time university. Limiting the number of HMOs would exacerbate this problem and the stressful, already competitive landscape of renting as a student in Aberdeen. Furthermore, there are simply not enough two-bedroomed flats at reasonable prices to accommodate all of the students in Aberdeen; by condensing ourselves into HMO properties, we're already largely doing the best we can to limit our impact on locals.

It should also be said that it is perfectly reasonable to want to live with more than one other person you are not related to simply because you want to. We are not in a position where we are settled with family, yet. I did not want to live with just one other person as, having moved away from home only a year beforehand and lived with multiple people in halls, it would have been ridiculous to be expected to choose just one other person to commit to a year of private renting with. You simply don't know people well enough yet. It seems ridiculous to suggest that such an imposition would be made on other adults without objective good cause or extreme backlash.

We are also human beings, and citizens. Many of us volunteer and give back to the area surrounding the University of Aberdeen and certainly sustain local businesses; on the whole, we are not nuisances and should not be deliberately targeted by policies as though we were. It is not too much to ask that our right to live a viable distance from our place of learning (as many of us do not own cars) and not pay a fortune to do so is respected.

Aberdeen does not need to try and push students away. Raising living costs through limiting accommodation would do just that.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

This policy is highly discriminatory against students which is absurd considering how much of the city's income derives from students. The benefits that students bring to the city should be recognised, not diminished. Aberdeen is known as one of the most expensive student cities to live in regarding living cost. Student halls alone are 102% of the student loan at the University of Aberdeen and removing the availability of HMOs just eliminates affordable housing.

I think that areas near the universities should not be targeted since many foreign students come yearly. Renting flats and rooms is a form of settling in the already present community, to feel home abroad. If you make it harder for students to find housing at reasonable prices, less people can actually afford enrolling to start with, making a separation in a community where backgrounds should no longer matter.

First what's wrong with the current situation, why do you want to hate student's like this, student purposes Accomodation has smaller room space, beds etc. This is where you should focus your effort to better students, lives.

It is hard enough to find anew affordable place to live in Aberdeen within walking distance of the university. This will only make things more difficult for students.

No arguments are given to support the overprovision policy. Why would it be a bad thing for there to be more HMOs around the university? The only explanation I can see is to force students to live in expensive, purpose built halls. Further, I was surprised to see on the map in the appendix how few there were to begin with, I would have thought those areas would have had more student occupiers. It is difficult enough to find somewhere to live as a student, having to start searching in February for September, this would only make it more difficult.

This policy targets living areas popular with students and introducing this policy would very likely force more students out of the targeted areas and into more expensive accommodation. Other options preferable to students (particularly UofA) would be the city centre area (since most students work in the city) or private student halls both of which are more costly but in regards to locations is more suitable. Introducing this policy would place students at a disadvantage especially those who want to share a living space in order for it be affordable for them.

dont limit hmos

**MAKE ACCOMMODATION CHEAPER AND AVAILABLE FOR STUDENTS**

By reducing HMOs in the areas highlighted the council will effectively be forcing students to move farther away from the university, and into more expensive new-build student accommodation that many students cannot afford. This is hugely detrimental to the student population who are already struggling to afford rent and travel to university within the city.

outrageous attempts to make student everyday life even more expensive!

HMO Overprovision Consultation - Comments Received  
NO Responses - Students

As a UoA student I am strongly displeased with this proposed policy. I lived in a HMO flat this year with 3 other students and I had a much better experience and enjoyed higher living standards while paying far less for student accommodation.

Aberdeen is already one of the most expensive cities in Scotland, and limiting opportunities for affordable housing for students would limit the attractiveness of the city for the best and brightest incoming students, who can potentially work for UoA in the future, not to mention contribute to the community and enrich it.

The exemption granted to student accommodation is similarly outrageous. They charge way over the private market and provide worse facilities and accommodations. My girlfriend had bruises from the mattress springs she was provided in Liberty Living, a student based accommodation.

Please do not make Aberdeen a harder city to live in for students that it already is.

no

Students give so much to these areas and introducing this policy would punish students disproportionately.

It makes no sense to lose houses for students to live in as these are the areas targeted as Aberdeen is already an expensive city to rent and live in as a student and this policy will only make it harder for students. Also it seems to be a policy only targeting students.

I believe this policy is unfair to the students of Aberdeen who contribute a lot to the city and deserve affordable housing and to feel like an appreciated part of the Aberdeen community.

I agree that there should be some restrictions which properties can have HMO license or not; such as whether the property is suitable for 3 or more people and so on. But I do not agree that there should be a restriction in the number of the HMO properties a city or area can have when the properties agree with the other requirements and are suitable for 3 or more people without personal relationships.

This will make accommodation very expensive for students.

No

It would not be fair to students who want to live in peaceful and quiet accommodation. They would have to be randomly put in pricey halls with mosy likely noisey students. I think it is a very biased, interest-driven measure because the council is hand-in-hand with the student halls owners, which only think about their profit.



**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

I don't see any negatives to there being a concentration of HMO licensed houses in an area, certainly not around the universities. It's already difficult as students to find shared housing, and this would only make it more difficult.

I have lived in college bounds for the past three years as a student. We have always been respectful neighbours yet have previously been targeted by a few individuals in the area with passive aggressive and unpleasant notes as they do not like the fact that students live close to the university. By allowing the policy to go through you are condoning this behaviour and allowing students to be used as scapegoats. My mum previously lived in the old Aberdeen area when she attended Aberdeen university. It has a long history of students and residents living in harmony. I don't see why limitation of hmo's is necessary. It will influence dramatically the ability for students to live in proximity to the university with access to its facilities. It will likely increase the living costs for students as they will be pushed further afield and be forced to pay for transportation as a result. I don't agree with this policy in the slightest.

The rent for HMO licensed flats in Aberdeen relative to other cities in the UK is already quite high. Implementing such a policy in areas near the University would make living increasingly unaffordable and would push many students into halls. Halls are ridiculously expensive and are extremely hard to afford for the average student (e.g. The cheapest rooms in Causeway View go for approximately 150 a week).

I disagree with it because I already cannot afford to live in halls, and furthermore I overwork myself every week when I should be studying instead, just to be able to afford to live and study (ironically).

I believe that restricting HMO licences will have a direct and negative impact on students, whilst at the same time there is no guarantee that the new occupants will take better care of the neighbourhood. Neighbourly feelings are up to the individual and have nothing to do with whether one is a student or not. Students should have the right to live anywhere they want in the city they now call home and should be treated a valuable members of society.

One of Aberdeen's biggest groups is students, and we work/pay rent/contribute to local economy just as much as any other group. We deserve better than to constantly pay huge sums of money for rent (Aberdeen is already very expensive.)  
Not just that, but I must also criticise the phrasing of the aim of this policy: "Excessive concentration of HMO". We are students. Our life revolves around university, and also (as many of us work) around town. Living close to university is essential for students, so of course some hmo will concentrate around university.  
Limiting the number of available hmo for students is not just bad for students and anyone else directly or indirectly working for the University, but also for Aberdeen in general - Aberdeen relies on students. We are a core part of this city.

This policy feels unfair and clearly targeted at students who find it hard as it is to find affordable flats without the need to bleed our entire earnings/ student loan on living in Aberdeen.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

It makes sense for students to live close to the universities so it does not make sense to me why this would be happening. My flatmates and I are part of the community in our area - we get on well with all our neighbours, even babysitting for them, and don't cause any trouble and it's people like us who would be being pushed out.

I am outraged by this draft policy! Accommodation in Aberdeen is expensive enough at the moment. Students are only allowed to live in the university halls in their first year and even the prices for rooms there are steadily on the rise. Regarding private university rooms, such as provided by Unite, students are looking at costs of around 600pcm which is extremely high.

Personally, I do not understand the need for HMO Licenses as a whole. They do not exist in any other European countries and I personally cannot see how the system in any way improves the standard of flats. In my second year of university, my friends and I struggled to find a flat with an HMO License. We, therefore, ended up living in a substandard apartment without heating, let by a private landlord we have not once encountered in person. The flat was in a very dodgy area and it was more than scary to wake home alone at night, especially as a girl.

I believe that the city of Aberdeen benefits from its large student community. They provide the city with an international atmosphere, the universities give the city a good reputation and they overall make the city a livelier place. I can therefore not understand why the City Council wants to make the life for students harder.

HMOs provide much needed affordable accommodation for students, particularly in a city with such high rental costs! There is a harmful misconception that all students have rich parents to pay their rent or bail them out - some of us are 'working class' and have to fend for ourselves. Yes, we don't need to pay council tax but in turn we cannot work the full-time hours needed to sustain a basic standard of living whilst also studying full-time at university (if we are to get the necessary grades in an increasingly competitive job market - i.e. it's not enough to just get a university degree anymore).

I feel that many of the issues surrounding HMOs are largely the responsibility of letting agents/landlords and that students are being unfairly punished. Overflowing wheelie bins - students don't generate significantly more household waste than other people but when there are high densities of people at the same address, more wheelie bins are needed - the council should provide these! Messy gardens - since many HMO tenants are renting for short time periods there is little point purchasing an expensive lawnmower or planting up gardens, especially since gardens are shared by tenants and may be accessed by non-tenants - perhaps it should be the landlord's responsibility to carry out occasional (twice yearly) garden maintenance? Antisocial behaviour - I currently live in a 'non-student' part of the city and there is a large amount of antisocial behaviour, mostly from neighbours who do NOT live in HMOs and DO pay council tax!

The Antisocial Behaviour Investigation Team (ASBIT), police and council should be able to tackle antisocial behaviour without discriminating against a specific demographic. It should be possible to find out who owns/lets out particular flats/properties so that direct complaints about antisocial behaviour can be easily made and followed up.

It's not a good solution to the housing problem. Putting students into overpriced student accommodation comes with the flaws of "not getting your first house" and learning how to engage with the council (tax exemption), the energy suppliers (finding deals), internet hosts, labour workers (for those renting privately). Most of these facilities run free heating and desensitises people to the luxury of heating and just how expensive it is. It would encourage a "stupider" upbringing of students. It minimises the learning curve.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

The proposed HMO policy makes the council appear to be trying to satisfy the wants of big companies such as Unite and Hello Student, and not the needs of students. Unite and Hello Student typically charge more for accommodation, compared to private landlords. The fact that the new HMO policy will only affect areas that have a high percentage of private landlords with property catered towards university students is deeply suspicious and sends out the wrong message to students. Likewise, the fact that the policy will not affect Unite or Hello Student adds yet more suspicion. The number of affordable properties would decrease, and this is not what students need.

HMO provides students with a more affordable alternative to halls.

The policy would mean many, many students (myself included) would be forced to rent expensive flats (e.g. unite, who's prices are way above the quality). By allowing a larger number of HMO properties in these areas it allows myself and friends (all students) to live together and overall have a better university experience. If this was taken away many students would not be able to afford the expensive flat and would either have to live alone or drop out of university - which is ridiculous.

Aberdeen is already tough with high accommodation prices near to the University that are also HMO licensed, it is not right to be able to limit this further.

Having sufficient properties with an HMO license is essential for Aberdeen to be able to support its student population, if nothing else, especially in these areas which are close to the university.

Ridiculous. Preventing students from easily accessing the university is discriminatory.

This policy is clearly designed to drive the living costs for students back up to their past 'standards', but it will be severely damaging for both the universities and the city itself. First, the student body is an important part of Aberdeen and they put a large amount of money into the community, this policy will only serve to drive up their living costs and place their money into the hands of richer landlords (who will be more likely to spend this income elsewhere), and the national companies who build the 'purpose built HMO accommodation'. The local economy would, in my opinion, suffer due to widespread loss of student disposable income. Second, prospecting students can and will look at this policy change, or at the very least its effects, and be put off coming to Aberdeen by it. The living cost is already a mark against Aberdeen for potential students, and putting this policy through is only going to exacerbate the issue. The areas outlined are known to be student hubs, they are immediately adjacent to the universities so it's to be expected, my fellow students and I are confused as to why this is seen as a problem. We have a right to live within the city the same as all residents and we have a unique need in that we need to live with fellow students and friends, and the HMO licencing is our ticket to do that. A restriction such as that proposed has a vast amount of potential for damage to Aberdeen's community and seemingly limited benefits, benefits not made clear to the public in any case.

This draft should be withdrawn immediately as it significantly harms students' rights to find affordable and accessible housing near campus.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

This is a poor motion that reduces the affordable property towards our student population, whom are a vital part of the Aberdeen City community. The passing of this would rise not only the price HMO properties, but also the prices of non HMO and private housing due to the increased demand.  
This is not a good or clever thing to do. I recommend that it does not go ahead and that such policies are properly thought about in future.

Dear Council,

As a student of University of Aberdeen in 3rd year, I have been struggling to find a place every single time I used to come from my summer holidays. And if we used to find a place, the rent used to be affordable at the level that we could survive. However, if you introduce this plan while to find a job is really difficult in Aberdeen, it will cause frustration and stress in students' head despite the subjects they have to study. Furthermore, freshers will not be willing to come to Aberdeen since the accommodation of the companies such as Unit or Hello Student is way out of the pocket for a student. Moreover, no one wants to spend their time travelling to University while they should be able to live next to University. Thank you for your time and understanding how important is the accommodation for students.

This draft policy will directly affect students and it appears to me that this is the only group of people who will suffer from this policy if implemented. Students want to live in residential areas in Aberdeen, in real homes- to make this city their home. Many would be forced to live by themselves and rely on specific student accommodation, which is insanely overpriced and unaffordable for most students. If this policy is implemented I would at least hope more would be done to regulate or cap student accommodation/halls, which has been an issue students have been raising for years in this city.

I can only assume that a reason for the introduction of this policy is because locals in residential areas do not wish to live next to students, as there is an assumption that we are noisy, drunken and inconsiderate. I think this assumption is an unfair generalisation, tarring tens of thousands of us with the same brush.

This policy will only exclude students further from communities and from the city centre of Aberdeen. Many rental properties already stipulate 'NO STUDENTS' when applying. We will be unable to live with friends in order to save money and live happily, and many will be unable to live within a reasonable distance of their university. I believe students contribute a lot to Aberdeen city - to the businesses here, the communities and to the diversity. Many of us work in the city centre part time too. I believe this policy will only punish is as a group.

It is unfair to reduce the number of students flats in the area which the university is situated. Students struggle already with debt and causing students to move further out would lead to them having to pay more for transport and also affecting university attendance. It is normal for students to live in the area around the University.

This policy is designed purely the limit where students can live. Students are active members of the community and deserve to live freely in Old Aberdeen

I believe that the introduction of this policy would cause difficulties to students. Students should be able to share properties or parts of properties, which plays an important social role. Most importantly, students should be able to afford reasonably priced household rents and it would become less attainable if this policy got implemented.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Students**

Students should be helped and encouraged in following their studies. The majority of us have part-time jobs so we can afford to live here and continuing our studies. Sharing an apartment it's a way of making it easier for saving some expences but also for our social life. If they would care truely about the students, then this will not go forward.

It's crap.....it is obvious that not to many students go for the overpriced student halls so what other option is there than limiting HMO's.....give them no choice and they'll have to pay for the dorms....

As a student in Aberdeen it is very important for me to be able to live in a private flat or house with a friend together. Houses or flats are more homely and comfortable. Another aspect is, that in student accommodations are a lot of parties organized by freshers. If we would have to move back into student accommodations as second, third or fourth year students this partying would have a negative affect on our grades. For me, living in student halls was combined with a lot of stress due to different ideas of how the flat was supposed to look like and who was cleaning which part.

This is why for me it is very important to find a flat close to University in which I can move with my good friend.

I was originally meant to be part of a flat of 4, but due to the lack of availability we've had to split into 2 groups of 2, and even as a 2, we are still struggling to find an appropriate flat

Many students are already working one or more jobs in order to just afford basic needs such as groceries besides their tuition fees and other costs for university. This policy will cost students a lot of money, either on housing or on travel to and from their campuses. They will have less time to work and/or study, which in the long run is bad for everyone.

It is not fair for students. Some of us cannot afford designated student flats because they cost more than any other accommodation in town. And why should we be forced to live in these halls with people we cannot choose and share facilities with them?

HMO licence does not affect families - they can still live in a HMO house whereas a group of students cannot live in a house that does not have a HMO so I do not see any point in trying to reduce the amount of HMO licensed properties. Especially in areas where most students are orientated anyway.

This policy ultimately discriminates against students who are proportionally more likely to stay in properties with HMOs in a city with multiple education institutions, including two fantastic universities.

## HMO Overprovision Consultation - Comments Received

### NO Responses - Students

I think this policy is reflective of the outdated mindset of the Aberdeen Council. Student accommodation is extortionate, and HMOs give older students (like myself who are in our 30s) who move to Aberdeen specifically for university somewhere to live whilst trying to survive financially. Instead of seeing students as the enemy, remember that they bring a lot to businesses in the area. You should instead be ensuring that HMOs landlords look after their properties to ensure neighbourhoods are well kept and "aesthetically pleasing".  
Enough with the war on students!

It's an anti-student policy. Aberdeen city council doesn't make any effort to make the public transport cheaper, so you cannot force students to live far from Uni.

This is discriminatory against students. Finding a place to live is hard enough as it is!

I think it's outrageous that you would consider making it harder for students to find a place to live! Imagine where Aberdeen would be if you didn't have two universities! It is expensive enough for students to live in Aberdeen as it is, and if you make it even harder for students to find affordable flats, then you will definitely see a decrease in people coming to study here. My current flat is not affected by this policy, however it would affect so many other students around the city and I think it's really sad that the targeted areas are just around the universities.

10% is a very low figure and would cause students to have to live a lot further out, or pay higher rental fees in private student accommodation.

Limiting HMOs would mean some students having to live in more expensive accommodation, or spending more money travelling across the city to get to University. With the recent fall in private rental sector prices, HMO-licensed private sector flats and houses are far cheaper to rent than halls offered by purpose-built student accommodation providers such as Unite and Hello Student, which can charge up to £12,000 a year per room. Further, many students wish to live in flats/houses not only because they are more affordable than private halls but also because they often offer larger living spaces, feel more homely, and enable students to live as residents within the local community.

The policy would have the outcome of making more difficult for students to find an affordable accommodation in a reasonable distance from the University facilities, business which is already difficult in Aberdeen, where rents are notoriously high.

There are something like 14,000 students at Aberdeen University, I know so many fellow students who have struggled to find suitable accommodation and of they have found a HMO flat near the university the rent has been much higher than other properties nearby. There is also no sense in pushing students into 'purpose built' student accommodation as these are also much more expensive than privately rented flats. If anything we need more HMOs in order to help stop students being ripped off.

HMO Overprovision Consultation - Comments Received  
NO Responses - Students

It will badly affect students at the University of Aberdeen and RGU.

It is already very difficult to find affordable 4 bedroom properties which have HMO licenses around the Aberdeen University area, don't think preventing more from being introduced is necessary.

I don't understand how their could be an "overprovision" - surely this housing would only be provided in areas that need it (such as near to universities).

Absolutely disgusting policy that will drive students away from Aberdeen to better priced Scottish cities like Edinburgh, Glasgow and Dundee.

WHAT IS THE FUCKING POINT! WE CAN BEARLY FIND A HMO HOUSE ALREADY! WHAT DO YOU WANT US TO DO LIVE ON THE STREETS!

A limit on HMOs would not be good for the student populations, as limiting student accommodations would either simply move HMO properties to other areas of the city, or force students to stay in prohibitively expensive student halls. Students are not the enemy - we want to encourage students to come to Aberdeen and spend money, etc not put them off living in the city.

Limiting HMOs would mean some students having to live in more expensive accommodation, or spending more money travelling across the city to get to University. With the recent fall in private rental sector prices, HMO-licensed private sector flats and houses are far cheaper to rent than halls offered by purpose-built student accommodation providers such as Unite and Hello Student, which can charge up to £12,000 a year per room. Further, many students wish to live in flats/houses not only because they are more affordable than private halls but also because they often offer larger living spaces, feel more homely, and enable students to live as residents within the local community. This policy is only targeting the areas of Old Aberdeen, Froghall/Powis/Sunnybank, and Garthdee – the three areas directly surrounding the two Universities in the city. Students give so much to the community, and we need to ensure that we are not shut out.

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - HMO Neighbours**  
(highlighted text suggests response intended as YES)

HMOs are not the problem, not enough affordable housing for students is the problem, leading to students being spread into the far reaches of the city and having to hang out at each other flats instead of staying in with flatmates or having a central area to hang out at.

The overprovision of HMO properties is not an issue. Limiting the availability of HMO's will make accommodation more expensive as it will be used less efficiently. Students will be forced to live further away from the universities. HMO occupants are valuable members of the community and should not be limited.

It is a ridiculous attempt to restrict student housing; my neighbours are students and they are lovely. It is only fair that they are allowed to live near to the University. I would not prefer any longer commute than I have now.

I think it is an attack on the ability of students to find affordable homes in the city. Given the lack of suitable student housing, I believe the councils behaviour is reckless and disregards some 25% of the cities population. Restricting HMOs will push people into unregistered and unsafe homes. I live in a street which has many HMO's and it is a friendly, communal place to live. Such a shame the council seeks to destroy this.

I firmly believe we already have more HMO properties in the areas listed, I have lived in Orchard Road for 40 Years and every year the situation worsens, I have no issues when the HMO residents behave responsibly, however I have only ever witnessed this once in all that time. I have 4 HMO houses within 40 yards of my own property. About 2/3 weeks ago 3 properties were having parties outside, barbeques, music, guitar sessions, alcohol etc, I can live with that until it continues into the early hours of the morning, especially when my two sets of young grandchildren are over for sleepovers and cant sleep for the noise.

The waste bins are always left in the street and the seagulls take advantage when the bins are filled to excess leading to the road covered in litter.

I am a caring responsible resident who is gradually losing patience and when once I cleaned up the litter I no longer bother as its nearly a full time job.



**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Other Organisations**

**RGU Students' Union**

I do not believe there is a need for a HMO Overprovision Policy. HMOs are a useful, affordable option for students living in the local community. They help students integrate with the community in Aberdeen and with student accommodation and private housing still expensive for students, HMOs are a great housing opportunity. I do not believe there is an over provision of HMOs in the Garthdee area and feel that HMO provision should be extended both for the student population and the local community. Through allowing HMO licences we keep properties safe by covering regulations and being a valuable opportunity for affordable housing.

**Aberdeen University Students' Association (AUSA)** wishes to register its opposition to the proposed HMO overprovision policy. Community cohesion is a key tenet of AUSA's work, and we feel that limitations to HMOs – particularly in areas surrounding the University of Aberdeen – would have a detrimental impact on current efforts to harmonise students and non-student residents. Part of our efforts around community outreach centre on breaking down the dichotomy between students and local residents – as students are also local residents. We wish to create a united community for the benefit of all.

Students on the whole wish to be citizens within Aberdeen communities, rather than ghettoized into private purpose-built student halls. These accommodations, as noted, are exempt from the HMO Overprovision policy, and a limitation on HMOs in the areas directly surrounding the University could result in more students moving into these expensive providers – in turn making this type of accommodation more profitable and more common. The cost of private halls is far above the market average for private rental flats and houses in the city – with some costing as high as £12,000 per year. We fear an HMO overprovision policy will further increase the cost of living for students in the city through having to move into more expensive private halls, or incurring higher travel costs in having to seek HMO properties situated further away from campus.

HMO properties enable students to move in with their friends, and also offer a great opportunity for University staff to live with colleagues, helping to create a community feel in the residential areas on and surrounding campus. In addition, we welcome the stringent conditions HMO properties are subject to, and note that this drives up housing quality within Aberdeen's private rental sector. We share concerns raised by The University of Aberdeen that an HMO Overprovision policy could have the effect of increasing rogue landlordism within the city, leading to further insecurity and poorer conditions for those living in the private rental sector.

We are disappointed to see that this policy focuses solely on the areas surrounding the two Universities within the city – Old Aberdeen, Froghall/Powis/Sunnybank, and Garthdee. This policy disproportionately affects students, who are both more likely to move into HMO-licensed properties and to seek accommodation close to campus than those with other occupations. As such, any attempt to limit 'concentration of HMOS' in these areas is, by extension, an attempt to limit the concentration of students. We feel that such attempts would not be made to reduce the concentration of those with other professions/occupations – such as nurses, doctors, and lawyers, for example. Indeed, it is students that will be our future nurses, doctors and lawyers.

We note that living in Old Aberdeen, surrounded by an idyllic ancient University campus, is a great place to live, but wish to emphasise that such aesthetic beauty in the area only exists as a result of students – without whom the University would not exist. It is thus unfair to limit the ability for students to live near the University campus. We further note that there is little demonstrable evidence to suggest high demand for families wishing to move into Old Aberdeen.

We reject accusations made by Old Aberdeen Community Council, who in support of this policy have suggested that 'students destroy communities', in turn furthering common misconceptions that students are 'anti-social' without any tangible evidence to support this. We firmly believe that students in fact enrich our communities – through volunteering in local schools and community projects, supporting local businesses both as workers and customers, and raising money for charity – the Raising and Giving campaign consistently raises over £100,000 every year for local charities.

We believe that a cap of 10% on HMOs in Census Output Areas within the three specified areas would disproportionately impact on the ability of students to live affordably within the city and should therefore be refused on the basis that Aberdeen welcomes students and recognises their importance to the city.

Should you require any further information from Aberdeen University Students' Association, please do not hesitate to contact us on [ausa@abdn.ac.uk](mailto:ausa@abdn.ac.uk)

**HMO Overprovision Consultation - Comments Received**  
**NO Responses - Other Organisations**

**Scottish Association of Landlords**

I do not believe there is a need for a HMO Overprovision Policy. HMOs are a useful, affordable option for students living in the local community. They help students integrate with the community in Aberdeen and with student accommodation and private housing still expensive for students, HMOs are a great housing opportunity. I do not believe there is an over provision of HMOs in the Garthdee area and feel that HMO provision should be extended both for the student population and the local community. Through allowing HMO licences we keep properties safe by covering regulations and being a valuable opportunity for affordable housing.

**University of Aberdeen - Full response attached**

## Feedback on HMO Overprovision Proposal – June 2017

Thank you for the opportunity to comment on the proposal from the Communities Housing & Infrastructure (CHI) committee for the introduction of a Houses in Multiple Occupation (HMO) Overprovision Policy for the City of Aberdeen.

You will be aware that our stance has consistently been to query the need for such a policy. We continue to remain unconvinced of the benefits of such a policy. Our previous comments in support of the current HMO regime remain relevant and are appended below.

We note also the comments of the Aberdeen University Students' Association (AUSA), in particular their comments on the importance of HMO accommodation to the student community.

We are aware that there are strongly held views on both sides. We are also aware that some, but not all, Scottish cities have such policies. We acknowledge that a possible outcome of this process is the introduction of such a policy. We feel, however, that a number of critical issues need to be (re) considered before such a decision is taken. In particular, we feel that how such a policy is framed, how it is targeted, and the threshold it is set at need to be reviewed.

At the University of Aberdeen our mix of HMO licenses covers a number of staff housing units and purpose built student accommodation sites. As an HMO license holder we have a very positive relationship with the HMO licensing team and trust that this will continue regardless of the outcome of this consultation. We are aware that while the proposed over-provision policy has the capacity to impact on both these activities, these are not the types of accommodation the proposed policy is primarily directed at; rather private rental properties in certain localities are the focus of this initiative.

We are, however, concerned, about the wider impact of this proposal on student communities in Aberdeen. In the first instance we feel it is important that the potential unintended consequences of the introduction of such a policy be fully considered. This includes the potential for private landlords to seek to subvert the new provisions by letting smaller properties not subject to HMO regulation or, worse, being tempted to operate unregulated accommodation. Neither of these outcomes benefit the safety and security of tenants in Aberdeen.

We would be interested in any analysis of the prevalence of unregulated HMO accommodation in Aberdeen and the extent to which this contributes to the neighbourhood issues cited by some of your respondents. We note, for example, that the Scottish Housing Minister has spoken recently of the need for existing legislation to be better enforced. With resources limited, might the targeting of landlords who breach existing HMO regulation have a greater impact than applying a policy that could inadvertently encourage more to seek ways around the licensing regime?

We are concerned about the targeting of a policy against only those communities close to the city's two universities. We feel this over-simplifies any community issues being experienced in areas with higher densities of HMOs by simply pointing at student tenants. These are complex issues that involve all residents regardless of their domicile status.

The policy as currently framed singles out three locations (Froghall / Powis / Sunnybank; Old Aberdeen; and Garthdee). These three neighbourhoods include a number of Census Output Areas (COAs) where student lets are concentrated. However, the CHI paper shows that many of Aberdeen's COAs with HMO densities of 10% or above are outside these three neighbourhoods. Our analysis suggests that as many as 20 of the 50 COAs cited in the latest paper would not be covered by the proposed policy e.g. Willowbank Road (42.5%), King St / East North St (20%), and Union Glen (17.3%). If applied as framed, the policy would apply only to certain streets in wards 6, 8 & 11 but not to several other streets in those same wards, nor to a number of COAs in wards 5, 12 and 13 where density is also above 10%. This seems inconsistent.

We would also be keen to know what the evidential basis for a 10% threshold is. We note that the proposal in an earlier consultation was for a 15% threshold. We also note that there was no consensus in the subsequent survey to support an assumption that 10% emerged as a preferred option. Indeed, those who did respond were overwhelmingly in favour of a limit well in excess of 10% or no limit at all.

We are aware that several respondent comments on the recent CHI paper referred to Dundee as having a 10% threshold in its policy. This seems to be mistaken as Dundee City Council's website indicates a threshold of 12.5% applied city-wide except in the City Centre (where no threshold is applied and where we understand student lets are prevalent). Elsewhere in Scotland, Stirling uses 15% in those areas where it has deemed it appropriate to establish a higher density threshold.

We are also unclear how a threshold could be applied only in the three neighbourhoods cited. As indicated above, the list of COAs with HMO densities above 10% includes several areas outside these neighbourhoods. At best this makes for a complex and bureaucratic HMO licensing picture. At worst this inconsistency could leave the process open to legal challenge or judicial review on the basis that the policy (as currently framed) is being unevenly, unfairly, or unreasonably applied across Aberdeen.

By targeting only these areas, it tends to reinforce an impression that the policy is aimed at students, rather than seeking to tackle any wider concern about HMO overprovision.

In summary, our stance remains that we are unconvinced of the need for an overprovision policy. We feel that the current regime works well and that the benefits of well-regulated HMO accommodation far outweigh the dangers of an unintended increase in unregulated accommodation.

We acknowledge, however, that such a policy may emerge as a result of this latest consultation. Should that be the case, we believe that the 10% threshold is too low and has no clear basis in the evidence or precedent. We would strongly encourage the City to set any threshold at a *higher level*. This would address the concerns of those localities with the highest densities of HMOs while limiting the number of COAs this impacts.

We also believe that if an overprovision policy has to be introduced, it must be applied consistently across Aberdeen or not at all. We feel it is inconceivable that a threshold could be applied selectively only in predominantly student areas of the City but not in others where that threshold is exceeded.

We would be very concerned about a policy that, in its framing and application, could be interpreted as discriminating against student communities.

Please see below a lightly edited version of our earlier comments of 13 January 2017 which remain relevant.

Should you require any further information on this matter from the University, please do not hesitate to contact us.

Yours sincerely,

[Redacted signature]

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Director of Estates | University of Aberdeen | King's College | Aberdeen AB24 3FX

T: [Redacted]

E: [Redacted]

## UOA Response to January 2017 HMO Paper

From: [REDACTED]  
To: [REDACTED] Sent: 13 January 2017  
Subject: FW: HMO Paper CHI/16/121: Comment from the University of Aberdeen

Dear [REDACTED]

Thank you for the opportunity to comment on the HMO paper due to be considered at committee on 24 January.

You will be aware that we have previously made representation on this issue and support a continuation of the current arrangements for oversight of HMO provision in the City.

To that end we welcome and endorse the substantive recommendations made in the paper [i.e. not to introduce an overprovision policy]. We note that the paper contains a wealth of valuable data concerning the range and scale of HMO provision in wards and neighbourhoods across the city, alongside some analysis of likely changes in the housing market in Aberdeen. If anything we would suggest that the paper could be stronger in arguing that recent changes in the residential market undermine the argument for such controls.

We also note that the paper makes clear that there are strongly held views on both sides of this issue. For our part we felt it was appropriate to reiterate our view of the benefits of HMO provision as we see them. These include reflections from both the staff and student perspective:

- HMOs ensure properties are regulated resulting in better standards particularly relating to safety.
- HMOs contribute to an affordable housing market for staff and students.
- The capacity in University owned student accommodation is limited and many students must procure accommodation in the private sector for most of their studies
- University provided HMO accommodation is, however, more affordable for students in comparison with many private providers and landlords.
- International students and their families, who are not familiar with the city, want to stay close to the University and to mix with other students.
- University student accommodation provides a raft of other services, including 24/7 security, pastoral support, and mechanisms through which community issues such as anti-social behavior can be addressed.
- University student accommodation houses a high number of different nationalities, actively encouraging tolerance and diversity amongst the student population and creating a more multi-cultural community.
- The proximity of University accommodation reduces the need for vehicular traffic, with students (and staff) more likely to cycle, walk or use public transport.
- Students in particular first year undergrads want to live in University owned accommodation; this is apparent from the high number of applications we receive every year.
- The University's ability to offer guaranteed accommodation to first time students is a major element in our recruitment of students.
- The provision of HMO properties for University staff assists with recruitment and is positive for the City in terms of the provision of high-quality jobs and diversity.
- HMO properties offer affordable and appropriate accommodation for single and junior staff members, post-doctoral staff and PhD students.
- Many University staff tenants are overseas nationals, some receiving modest grants or bursaries and most with no transport. Local, affordable accommodation is vital for them.
- Many staff welcome the opportunity to share with other staff as this allows them to settle quickly into the area, creating a community feel in Old Aberdeen.
- Visiting staff and students can be here for short periods e.g. 3 – 6 months and prefer to live locally for that period.
- Demand for staff housing of this kind far exceeds availability and the University is turning away staff seeking such accommodation.

Yours sincerely, [REDACTED]



[REDACTED]

5<sup>th</sup> June 2017

HMO Consultation  
Business Hub 11  
Second Floor West  
Marischal College  
Aberdeen City Council

Dear Sirs,

**HMO Consultation Survey May/June 2017**

Due to lack of space on the HMO Consultation Form (which we enclose). We wish to state in this letter the Society's comments on the draft HMO Overprovision Policy which is to be considered at Full Council on 21<sup>st</sup> June.

Our comments are as follows –

1) **Threshold**

We agree with the 10% threshold.

We suggest, however, that it is made clearer in the wording of the Policy, that if the granting of an HMO licence to a property **would result** in a provision level exceeding 10%, then the Licensing Committee will consider this to amount to **overprovision** of HMOs in that COA and may not grant the licence. As the Policy stands, this is not clear, and this is important. Without this clause, the provision level could go above the 10%, which is exactly what the Policy is designed to prevent.

2) **Applicability**

(a) We agree that the policy should apply to Froghall, Powis and Sunnybank, Old Aberdeen and Garthdee areas, **but not based on the boundaries of "neighbourhoods"**. Community Planning Neighbourhoods are **not** the best way, or indeed an appropriate way, of delineating the boundaries of areas to be covered by the Policy.

**We strongly urge that the areas should be those delineated by Community Council boundaries, instead**, as these are the most commonly used boundaries, and are familiar to everyone, easy to understand, and easy for people to recognise.

(b) In particular, we speak not only for the Society, but also for the residents of **the pink and grey granite houses of the east side of Tillydrone Avenue (nos 54-88)** when we ask that these houses be **included** in the areas covered by the Overprovision Policy. These houses are the only ones **within the Old Aberdeen Community Council boundaries** which have been **excluded** from the Policy as it stands, and this exclusion does not make sense.

Conservation Area as well as the Old Aberdeen Community Council Area. On both counts, we, along with the residents of these houses, feel strongly that this is an important part of Old Aberdeen. Indeed, it is one of the oldest corners of the Old Aberdeen Conservation Area. Historically, it has always been part of Old Aberdeen, and these houses, built by the University in the mid-20<sup>th</sup> century, are clearly intimately connected with the activities of the University Community in Old Aberdeen, as much of the staff houses in the High Street.

Further, they have been designated as part of Old Aberdeen for all purposes for many years. We request that they be included, and note that this would automatically be the case if the boundaries of areas covered by the Policy were the Community Council boundaries.

(c) The maps provided with the Report which are meant to illustrate the areas covered by the Policy, are incomplete. For instance, the map for Old Aberdeen cuts off the whole of the northern section.

(d) All Census Output Areas included should be clearly identified on a map of the areas to which the Policy will apply. The whole rationale of the Policy is founded on percentages of HMO numbers in each COA, and it is therefore imperative both for ease and transparency, that the Policy is accompanied by clear maps showing the exact boundaries of each COA, as well as their reference numbers.

(e) In this connection, it is vital that any COA which is partly within an area to which this Policy applies, should be shown in its entirety, and that this whole COA should then be included in the area covered by the Policy, for the sake of clarity, completeness, and the logical functioning of the system.

\* \* \*

To conclude, Old Aberdeen Heritage Society strongly agrees in general with the introduction of an HMO Overprovision Policy, subject to the comments made above. This Policy is long overdue, and the need for this policy is now urgent, to address a serious social issue, which has been outstanding now for years.

Yours sincerely  




Planning Secretary